UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 14 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7679 6484
RETURN RECEIPT REQUESTED

Peter Ashbrook
Director
Division of Research Safety
102 Environmental Health and Safety Building, MC-255
101 South Gregory Street
Urbana, Illinois 61801-3070

Re: Notice of Violation
University of Illinois at Urbana - Champaign
EPA Id No.: ILD041544081

Dear Mr. Ashbrook:

On July 24, 2013, a representative of the U.S. Environmental Protection Agency inspected the University of Illinois at Urbana - Champaign's facility located in Urbana, Illinois. The purpose of the inspection was to evaluate the University of Illinois at Urbana - Champaign's compliance with its RCRA Hazardous Waste Permit and certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference. Subsequent to the inspection, you provided additional information in a letter dated September 16, 2013.

Based on information provided by the University of Illinois at Urbana - Champaign's personnel, review of records, and physical observations made by the inspector at the time of the investigation, EPA has determined that the University of Illinois at Urbana - Champaign is in violation of its RCRA Hazardous Waste Permit, and certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR). We find that the University of Illinois at Urbana - Champaign's Hazardous Waste Storage Facility was not in compliance with the following conditions with its RCRA Hazardous Waste Permit, or the campus for a hazardous waste storage permit exemption, and in violation of the following requirements:

TSDF Permit Requirements

1. Labeling of Containers: All containers shall be labeled with appropriate U.S. EPA Hazardous Waste Codes. See Standardized RCRA Hazardous Waste Permit for the University of Illinois at Urbana – Champaign, § II.B. 1. At the time of the inspection, the Permittee did not label containers in Room 101 with U.S. EPA Hazardous Waste Codes. Therefore, the Permittee was in violation of its RCRA Hazardous Waste Permit. You addressed this violation in the letter dated September 16, 2013; therefore, no further action is required.

2. Treatment of Hazardous Waste Without a Permit: The Permittee is allowed to store hazardous waste in accordance with the conditions of the permit; the Permit does not address on-site treatment of hazardous waste. See Standardized RCRA Hazardous Waste Permit for the University of Illinois at Urbana – Champaign, § V1.A. At the time of the inspection, the Permittee had records, in the form of ten certificates from 2012, indicating that the Permittee was conducting onsite treatment for stabilization and deactivation, processes that are not included in the permit. EPA recommends either stopping the treatment processes, or modifying the RCRA Hazardous Waste Permit to address stabilization and deactivation activities.

3. Failure to Conduct Waste Analysis: The Permittee shall obtain a detailed chemical and physical analysis of a representative sample of the wastes prior to treatment or storage of any hazardous waste. See Standardized RCRA Hazardous Waste Permit for the University of Illinois at Urbana – Champaign, § VII.B.1. Waste Analysis. At the time of the inspection, the Permittee stored 11 small containers labeled with the accumulation start date of 7/24/12. According to personnel present, workers labeled the containers with nonhazardous waste labels by default. According to personnel present, a contractor must evaluate the waste to determine if it is hazardous waste prior to shipment. Therefore, the facility did not conduct a waste analysis for this waste. See page 7, picture 5, of the inspection report.

4. Inspections Records: At a minimum, the Permittee must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions. See Standardized RCRA Hazardous Waste Permit for the University of Illinois at Urbana – Champaign, § VII.D General Inspection Requirements. At the time of the inspection, the Permitte marked the inspection dates, but not times, on the inspection records.

Land Disposal Restrictions

5. Storage of Hazardous Waste for over one year: An owner / operator of a treatment, storage or disposal facility may store such wastes for up to one year. See 35 IAC § 728.150 [40 CFR § 268.50(b)]. At the time of the inspection, the Permittee stored the following containers of hazardous waste at the facility for over one year (with reference to the picture and page number in the inspection report):

- One Hazardous Waste Container dated 11/10/2011; page 8, picture 7.
- One Hazardous Waste Container dated 07/03/2012; page 9, picture 9.

which is under the control of the operator of the process generating the waste provided the generator mark the containers with either the words "hazardous Waste" or with words that identify the contents of the containers. See 35 IAC 722.134(c)(1)(B) [40 CFR § 262.34(c)(1)(ii)]. At the time of the inspection, the facility stored 16 containers of hazardous waste at the Seltz Materials Research Building in Room 0428 that were not identified with the contents of the containers or marked the words, "Hazardous Waste." See page 30 of the inspection report. You addressed this violation in the letter dated September 16, 2013; therefore, no further action is required.

8. Contingency Plan: In order to avoid the need for a hazardous waste storage permit, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or interim status, provided that the waste is placed in containers and the generator has a contingency plan that includes a list of all emergency equipment at the facility and decontamination equipment where this equipment is required. The plan must include the location and a physical description of each item of equipment on the list, and a brief outline of its capabilities. See 35 IAC § 722.134(a)(1)(A) referring to 725.152(e) [40 CFR § 262.34(a)(1)(i) referring to § 265.52(e)]. At the time of the inspection, the All Hazard Contingency Plan did not include the description, capability and location of emergency equipment located throughout the campus. You partially addressed this in your September 16, 2013 letter; please provide examples of the requirements from the campus wide All-Hazards Contingency Plan.

Campus Universal Waste Requirements

9. Universal Waste, F&S Universal Waste Building 244: A small quantity handler of universal waste must:

a. Contain any lamp in containers or packages that remain closed. See 35 IAC § 733.133 [40 CFR § 273.13(d)(1)]. At the time of the inspection, waste lamps were stored in a container that was not closed.

b. Label or mark the universal with the words, "Universal Waste – Lamp(s))," or "Waste Lamp(s))," or "Used Lamp(s)." See 35 IAC § 733.134 [40 CFR § 273.14(e)]. At the time of the inspection, waste lamps were stored in containers marked with the words, "Bad Lamps."

c. Be able to demonstrate the length of time that the universal waste has been accumulated from the date it became a waste or is received. See 35 IAC § 733.135 [40 CFR § 273.15(c)]. At the time of the inspection, one container was marked with the date, "5/15/8," which did not allow the handler to demonstrate that length of time was waste had been accumulated.

You addressed these violations in the letter dated September 16, 2013; therefore, no further action is required.

Area of Concern: Closure Cost Estimate

The inspector documented the following concerns with the Closure Cost Estimate at the time of the inspection:

U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	University of Illinois Main Campus
EPA ID NUMBER:	ILD041544081
ADDRESS:	101 South Gregory Street Urbana, Illinois 61801
DATE OF INSPECTION:	July 24 and 25, 2013
EPA INSPECTOR:	Daniel F. Chachakis Environmental Policy Specialist (EPS)

PREPARED BY:

Daniel F. Chachakis, EPS — Date: 8/26/2013
Compliance Section 1

ACCEPTED BY:

Michael Cunningham, Chief — Date: 9/19/13
Compliance Section 1

operations. Mr. Scherer and Mr. Hill led the tour and provided me with the records I requested for review.

I provided a Small Business Resources information sheet and the Illinois Sustainable Solutions brochure to Mr. Ashbrook. The U of I Main Campus is the home of the Illinois Sustainable Solutions organization. We discussed for the site tour the following safety equipment was recommended or required: safety glasses, steel-toed boots, potential for hearing protection, and hard hat. I also recommend gloves for handling containers of chemicals.

I informed Mr. Ashbrook that U of I could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. Mr. Ashbrook, as the U of I representative, did not make a CBI claim on the information gathered during the inspection.

Site Description

U of I is a public university, an entity of the State of Illinois. U of I began in 1867, originally chartered as the Illinois Industrial University. U of I opened for business in 1868. Renamed U of I in 1885, it is one of the original 37 public land-grant institutions created after President Abraham Lincoln signed the Morrill Act in 1862. U of I consists of 17 colleges and instructional units with 320 Main campus buildings covering 2.8 square miles (1,783 acres), and 647 total buildings covering 7.1 square miles (4,552 acres). In 2012, 44,520 total students attended U of I, including 32,281 undergraduate and 12,239 graduate and professional students, and 4,447 international undergraduate students. There are 2,548 faculty members; 3,665 administrative and academic professionals; and 4,136 support staff working at the campus.

Building 372 is the U of I TSDF facility; U of I also notified as a large quantity generator using the same ID number.

During the site description, Mr. Hill provided the TSDF permit to me for review. I recorded the following information from the permit:

- The permit was dated September 12, 2008, and expires on September 12, 2018.
- The special materials storage facility, also known as the Hazardous Waste Storage Facility, is located at 2006 Griffith Drive, Champaign, IL 61820.
- Each Room at the TSDF has a maximum storage limit and type of waste criteria:

- Room 101	Solvent	3,080 gallons
- Room 102	Solvent	400 gallons
- Room 103	Pesticides	200 gallons
- Room 105	Lab Packs	1,265 gallons
- Room 106	Misc Chemicals	1,250 gallons
- Room 107	Bases	900 gallons
- Room 108	Reactives	200 gallons
- Room 109	Explosives / Gas Cylinders	250 gallons
- Room 110	Oxidizers	100 gallons
- Room 111	PCB / Dixon	1,300 gallons

Building 372: We walked through the rooms of Building 372.

- Room 101 – Flammable Solvents: I observed, and took a picture of, the presence of non-halogenated, halogenated, and low pH containers of hazardous waste (Picture 2).

Picture #: 2
Date: July 24, 2013
Photographer: Daniel F. Chachakis
Location: Building 213, Room 101
Subject: Containers

I counted thirty-one 55-gallon drums, containing approximately 1,705 gallons of waste. I observed that:

- The drums did not have accumulation start dates, but that it appeared that all containers were initiated with the year 2013.
- All containers were closed.
- Waste profile numbers were marked on the drums.
- All containers were marked with a description of contents.

- Room 102 – Flammable Solvents: I observed, and took a picture of, three partially filled drums in a protective cabinet (Picture 3). I observed that each drum was marked with an accumulation start date and waste profile number.

- Room 106 – Miscellaneous Chemicals: I observed the presence of organic, inorganic, and mercury hazardous wastes. Mr. Hill stated the smaller containers are accumulated on shelves and then transferred to larger containers. I observed, and took a picture of, a tray with accumulations start dates from July 24, 2012 to July 27, 2012 (Picture 5).

Picture #: 5
Date: July 24, 2013
Photographer: Daniel F. Chachakis
Location: Building 213, Room 106
Subject: Containers in a tray

I recorded the contents of the containers in Picture 5 according to their labels:

- 2006190173 7/24/2012 Non-hazardous waste label
- 2006190331 7/24/2012 Non-hazardous waste label
- 2006190174 7/24/2012 Non-hazardous waste label
- 2006191392 7/27/2012 Non-hazardous waste label
- 2006189836 7/19/2012 Non-hazardous waste label
- 2006190172 7/24/2012 Non-hazardous waste label
- 2006191402 7/27/2012 Non-hazardous waste label
- 2006190443 7/24/2012 Non-hazardous waste label
- 2006191393 7/27/2012 Non-hazardous waste label
- 2006191314 7/27/2012 Non-hazardous waste label
- 2006189843 7/19/2012 Non-hazardous waste label

Mr. Hill stated that the wastes in Picture 5 were screened, but that the contractor must conduct a further screening to determine whether or not the wastes are hazardous wastes despite the non-hazardous waste label. Mr. Hill stated that the non-hazardous waste label was the default label.

I took an overview picture of Room 107 (Picture 8).

Picture #: 8
Date:
July 24, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 213, Room 107
Subject:
Containers

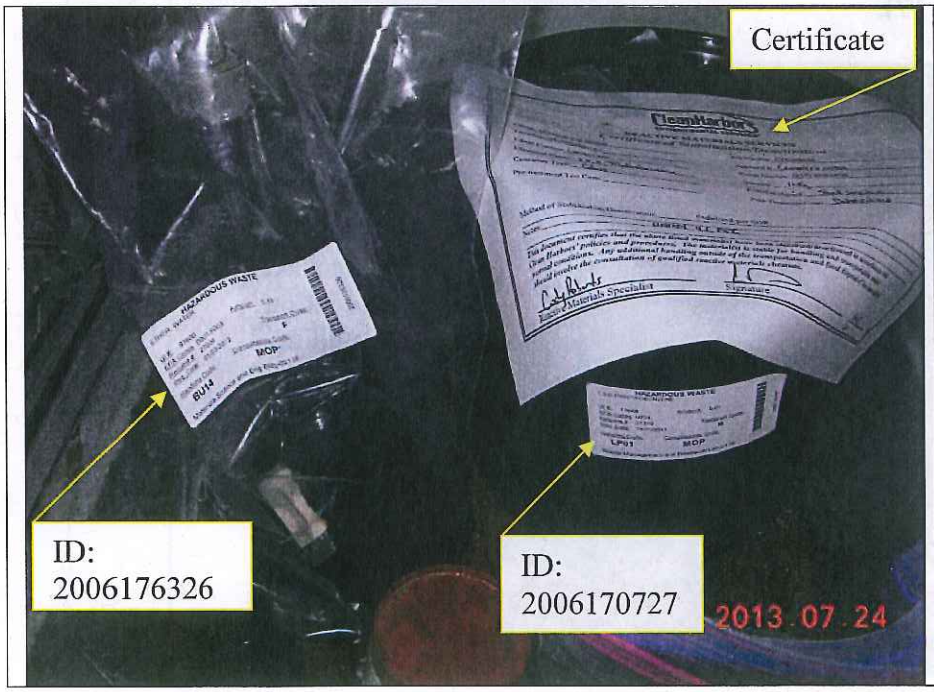
- Room 108 – Reactives: I observed that reactive chemicals are stored in this Room. I observed, and took a picture of, a container marked with the date, "7/03/2012", the ID number "2006187882", and the words, "Bag, Vanadium (V) Trilsopropoxide" and "Hazardous Waste" (Picture 9).

Picture #: 9
Date:
July 24, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 213, Room 108
Subject:
Containers

I observed, and took a picture of, 11 cabinets in Room 108 (Picture 12); the cabinets were labeled, from left to right, "Alkali Metals," "Meraptous, Sulfides and Cyanides," "Reducers," Polymerizables and Epoxides," "Acids and Corrosives, "Water Reactive," and "Air Reactive."

Picture #: 12
Date:
July 24, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 213, Room 108
Subject:
Cabinets

- Room 109 – Gas Cylinder and Explosive Storage: I observed, and took a picture of, a container marked with the words, "Ether/Water" and "Hazardous Waste," the ID number "2006176326," and the date, "01/23/2012" (Picture 13). I observed, and took a picture of, a container marked with the words, "1,35 Trinitobenzene," and "Hazardous Waste," the ID number, "2006170727," and the date, "10/25/2011" (Picture 13). I observed the presence of what was titled a, "Certificate of Stabilization" from Clean Harbors, marked with the date, "4-4-13," documenting an on-site treatment event.



Picture #: 13
Date:
July 24, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 213, Room 109
Subject:
Containers

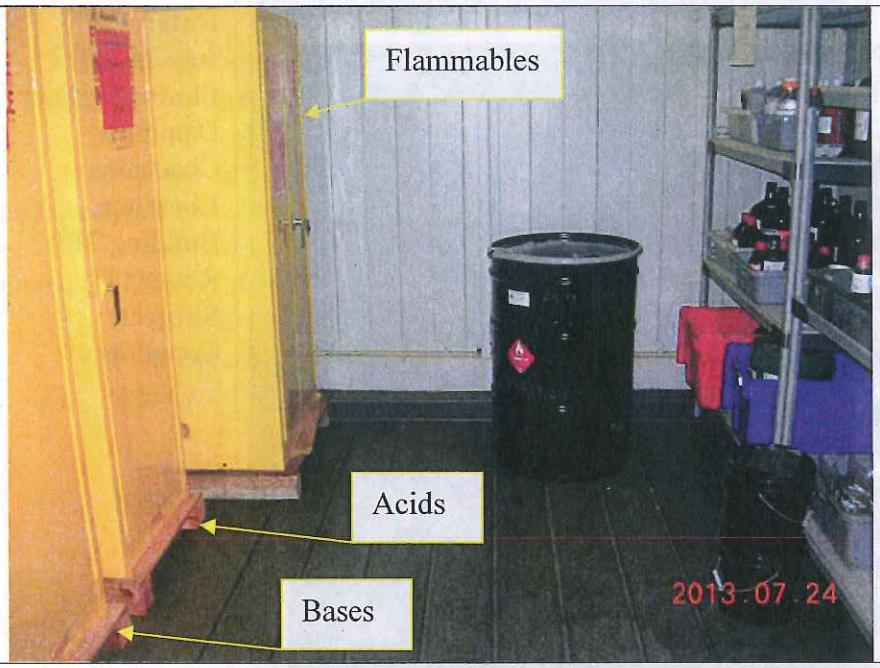
I observed, and took a picture of, three small canisters, all marked with the words, "Clyclopropane (gas)," and "Hazardous Waste," the date, "6/12/2012," and the ID numbers, "2006185857," "2006185858," and "2006185859" respectively (Picture 16).

Picture #: 16
Date: July 24, 2013
Photographer: Daniel F. Chachakis
Location: Building 213, Room 109
Subject: Container

I observed, and took a picture of, a container marked with the words, "Mapp Gas," the ID, "2006186135" (Picture 17).

Picture #: 17
Date: July 24, 2013
Photographer: Daniel F. Chachakis
Location: Building 213, Room 109
Subject: Container

I took an overview picture of Room 109 (Picture 20). I observed that the yellow lockers were labeled, from left to right, with the words, "Gas Cylinder Toxic Bases," "Gas Cylinder Toxic Acids," and "Gas Cylinder Toxic Flammables."



Picture #: 20
Date:
July 24, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 213, Room 109
Subject:
Cabinets

- Room 110 – Oxidizers: I observed, and took a picture of, a container marked with the words, "Characterized Waste – Other" and "Non-hazardous Waste," the ID number, "2006181281," and the date, "3/30/2012" (Picture 21).

Picture #: 21
Date:
July 24, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 213, Room 109
Subject:
Container

- Room 111 – PCB / Dioxin: I counted eighteen 55-gallon containers of used oil, or approximately 990 gallons. I observed, and took a picture of, containers of PCBs (Picture 24).

Picture #: 24
Date:
July 24, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 213, Room 111
Subject:
Containers

- Room 113 – Acids: I observed, and took an overview picture of, Room114 (P25).

Picture #: 25
Date:
July 24, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 213, Room 114
Subject:
Containers

- The plan was for the TSDF facility, and was located at the facility.
- The plan was revision 17.0, effective February 21, 2012.
- The emergency coordinators included Landon Hill and Peter Ashbrook, with address and phone number information in the plan.
- The plan discussed containment trenches in the areas where liquids are stored.
- The plan discussed the location of fire alarm pull stations, telephones, emergency warning signs, and fire extinguishers.
- The plan addressed fire, explosions, and releases of hazardous waste.
- The plan contained an evacuation plan.
- The plan described the actions of the fire departments available to respond.
- The plan discussed the actions of the on-campus police force
- The plan discussed hospitals and clinics
- The plan discussed emergency response contractors: Bodine Environmental Services and Clean Harbors
- The plan contained notifications to U of I PD, Champaign Fire Department, Urbana Fire Department, Champaign Police Department, Champaign County Emergency Services and Disaster Agency, Carle Foundation Hospital, and the Provena Covent Medical Center.

Inspection Schedule: The inspection Schedule called for daily, weekly, and monthly inspections. Records were available for 2010-2013. Signatures on the inspection forms included Jamie Richards, Landon Hill, and Debra Maze. Records documenting inspections did not include the time of the inspection.

Manifests: Manifests were available from 2009 through the date of the inspection.

2013 Manifest Review

Manifest #	Facility Rep	Date Signed	TSDF Date	Comments
006560714FLE	Landon Hill	03/19/2013	04/16/2013	TSDF: Clean Harbors Services, Cleveland, OH OHD000724153
005398004JJK 005398001JJK 005398003JJK	Land Hill	03/08/2013	03/26/2013	Trans 1: Clean Harbor MAD039322250 --- Trans 2: Triad Transport OKD981588791 (Hand Written onto the manifest)

005397922JJK	Trans 1: Clean Harbors Trans 2: Robbie D. Wood, Inc. TSDF: Clean Harbors El Dorado	w/LDR
006086817FLE	Trans 1: Clean Harbors Trans 2: Triad TSDF: Clean Harbors El Dorado	w/LDR
005397916JJK	Trans 1: Clean Harbors Trans 2: Robbie D. Wood, Inc. TSDF: Clean Harbors El Dorado	w/LDR
005397917JJK	Trans 1: Clean Harbors Trans 2: Triad TSDF: Clean Harbors El Dorado	w/LDR
005397866JJK	Trans 1: Clean Harbors Trans 2: Triad Trans 3: "Agent for Clean Harbor Environmental Services" TSDF: Clean Harbors El Dorado	w/LDR
005397870JJK	Trans 1: Clean Harbors Trans 2: R.D. Wood Trans 3: "Agent for Clean Harbor Environmental Services" TSDF: Clean Harbors El Dorado	w/LDR
005397872JJK	Trans 1: Clean Harbors Trans 2: R.D. Wood Trans 3: "Agent for Clean Harbor Environmental Services"	w/LDR
005397874JJK	Trans 1: Clean Harbors Trans 2: R.D. Wood Trans 3: "Agent for Clean Harbor Environmental Services"	w/LDR

006086814FLE	Missing waste codes for waste corrosive liquid, basic, inorganic
005397840JJK	TSDF: Spring Grove Resource Recovery, Cincinnati, OH; OHD000816629
005397835JJK	TSDF: Clean Harbors La Porte, LaPorte, TX; TXD982290140
005215953FLE	Trans: Clean Harbors TSDF: Ross Incineration Services, Inc., Grafton, OH; OHD048415665
000906033JJK	Trans 1: Philotechnics, Ltd, TNR000030544 TSDF: NSSI Recovery Services, Houston, TX; 982560294

005397718JJK	Trans: CAST Transportation TSDF: Energy Solutions, Clive, UT; UTD982598898	Signature: D. Jordan, a contractor representative	Signature: Rich Holm, an administrator and representative of U of I

006086815FLE	006086816FLE	005397866JJK	005397867JJK	005261047FLE
005397868JJK	005397838JJK	005397839JJK	005397841JJK	005260944FLE
005397842JJK	005397843JJK	005397833JJK	005397836JJK	005260947FLE
005397837JJK	005552858FLE	005552861FLE	005552862FLE	005260947FLE
005397796JJK	005397803JJK	005397799JJK	005397805JJK	004893575FLE
005612279FLE	005612280FLE	005209885FLE	005397740JJK	004893567FLE

Picture #: 28
Date:
July 24, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 213
Subject:
Sign on gate

I departed the facility at approximately 4:20 PM.

Day 2
I arrived at approximately 8:00 AM, and immediately continued the records review.

Records Review, Day 1

Training Program: I reviewed the training records and made the following observations:

David Scherer	Associate Director, Division of Research Safety
Landon Hill	Chemical Waste Manager
Jamie Richards	Chemical Waste Professional
Brian Meschewski	Chemical Waste Professional
Keith Natchtigall	Environmental Health and Safety Technician III
Alex Weise	Environmental Health and Safety Technician I
Heather Craven	Environmental Health and Safety Technician I
Peter Ashbrook (from contingency plan)	Emergency Coordinator

- Records from hire date to date of the inspection were available, as well as employment start dates
- Employee training sign in sheets were available. I reviewed 2010-2012. Next training secession is due in December, 2013.
- 2011 records included Peter Ashbrook, Debra Maze, and Elizabeth Schmidt. Records for Debra Maze and Peter Ashbrook were available.
- 2010 records included Kathy Benedict, Joe Perilongo, and Karla Southern.
- Records for Carla Southern, Kathy Benedict, and Joe Perilongo were available.
- Job titles and job descriptions were available, as well as type and amount of training.

Dynamics Testing Lab, Building 31: Mr. Scherer stated the facility was for radioactive waste and sharp storage. I observed, and took a picture of, a medical waste / glass and sharps containers (Picture 30).

Picture #: 30
Date:
July 25, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 31
Subject:
Containers

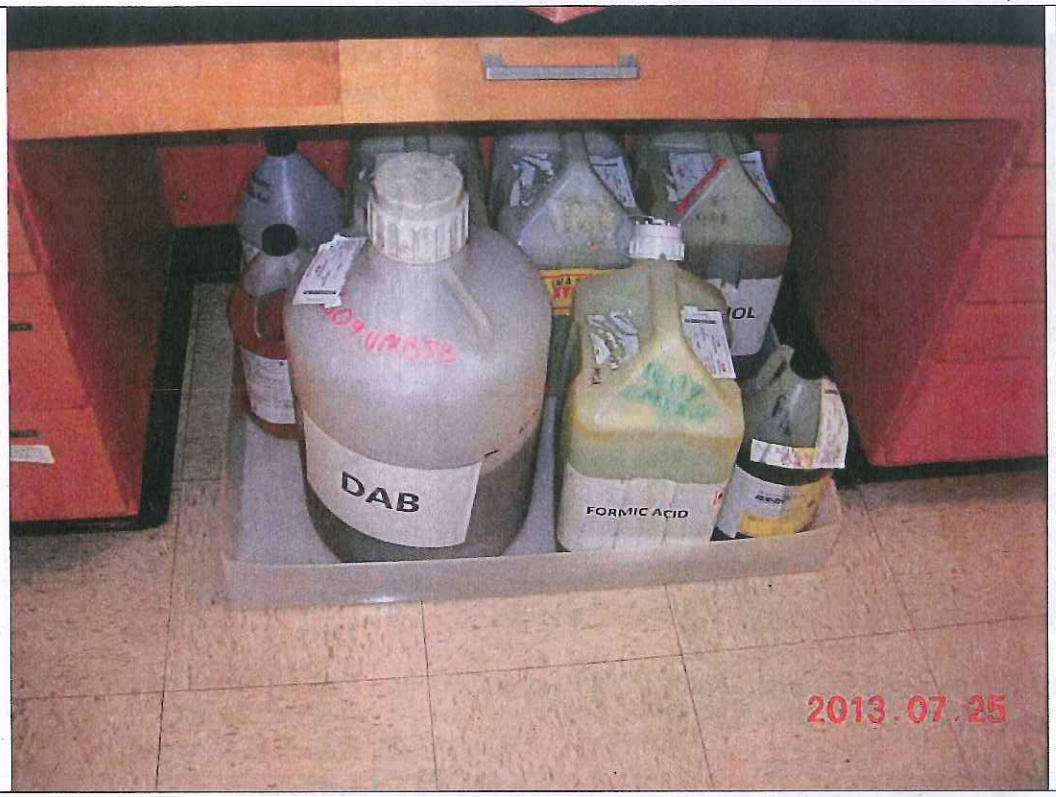
I observed, and took a picture of, radiation waste containing drums (Picture 31).

Picture #: 31
Date:
July 25, 2013
Photographer:
Daniel F. Chachakis
Location:
Building 31
Subject:
Containers

Brightness: +12%
Contrast: +7%

I observed that all containers were marked with the contents and closed. However, based on a discussion with the facility representatives present, I determined that the accumulation start date is not necessarily the date on the TSDF label; the accumulation start date could be seven days earlier.

Veterinary Medical Building (VMBSB), Room 1609: This room is associated with Room 1613. I observed, and took a picture of, satellite containers (Picture 33).



Picture #: 33
Date: July 25, 2013
Photographer: Daniel F. Chachakis
Location: Vet Med Building, Room 1609
Subject: Containers

I inventoried the containers:

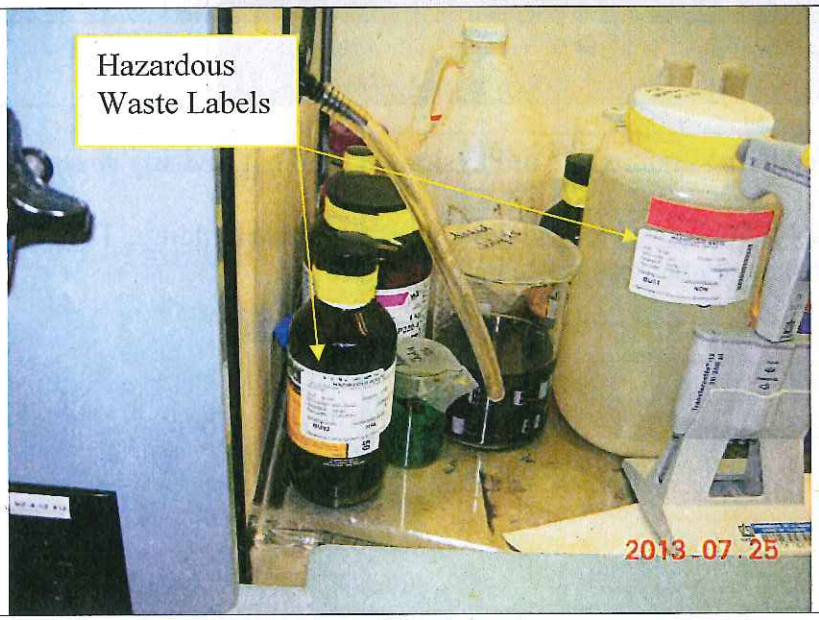
Xylene / Acetone	7/19/2013
Formic Acid	7/19/2013
Acetone, Picric Acid	7/19/2013
Alcohol	7/19/2013
Xylene	7/19/2013
Formic Acid	7/19/2013
Waste Alcohol	Still in use
Define Waste	Still in use

Building 213: We returned to building 213 to review the campus wide emergency action plan, titled the Campus Wide Emergency Plan, and dated December 10, 2012. This plan covered the entire campus; each building has its own building specific emergency action plan.

Newmark Civil Engineering Building, Room 4206: We moved to the Newmark Civil Engineering Building, and met Dr. Qi, floor manager responsible for room 4206. I observed, and took a picture of, satellite containers in room 4206 (Picture 36). Each container was labeled or marked with the contents of the container.

Picture #: 36
Date:
July 25, 2013
Photographer:
Daniel F. Chachakis
Location:
Newmark Civil Engineering Building, Room 4206
Subject:
Containers

Newmark Civil Engineering Building, Room 4124: I observed, and took a picture of, satellite containers (Picture 37).



Picture #: 37
Date:
July 25, 2013
Photographer:
Daniel F. Chachakis
Location:
Newmark Civil Engineering Building, Room 4124
Subject:
Containers

Picture #: 39
Date: July 25, 2013
Photographer: Daniel F. Chachakis
Location: F&S Universal Waste, Building 244
Subject: Boxes

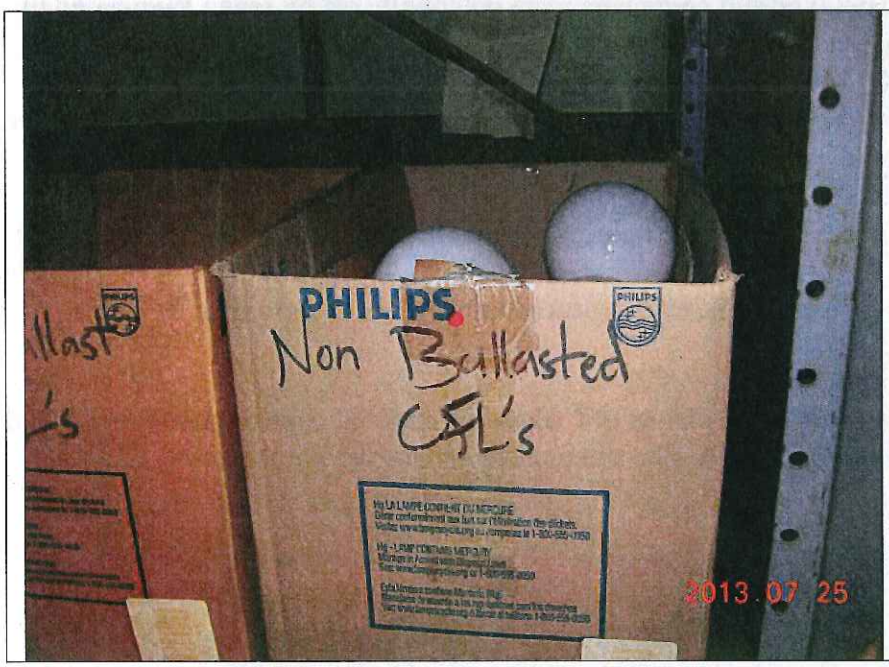
I observed, and took a picture of, boxes marked with the words, "Bad Lamps" and "Waste" (Picture 40).

Picture #: 40
Date: July 25, 2013
Photographer: Daniel F. Chachakis
Location: F&S Universal Waste, Building 244
Subject: Marking

I observed, and took a picture of, a box of used bulbs with the date, "5/15/8." I found the box under a shelf; the box was covered in dust.

Picture #: 43
Date:
July 25, 2013
Photographer:
Daniel F. Chachakis
Location:
F&S Universal Waste, Building 244
Subject:
Box of used bulbs

I observed, and took a picture of, a box without a cover (Picture 43).



Picture #: 43
Date:
July 25, 2013
Photographer:
Daniel F. Chachakis
Location:
F&S Universal Waste, Building 244
Subject:
Box

Mr. Hill stated that workers using the labs are responsible for satellite accumulation areas, and those workers are not part of the hazardous waste training program for the TSDF.

ATTACHMENT A
Checklists

Univ IL-Urbana 7-24-2013

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	PART 725: INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES	
	SUBPART A: GENERAL PROVISIONS	
	Section 725.101 Purpose, Scope and Applicability	
725.101(c)	Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes____ No X N/A____	
	Note: If "Yes", explain in the narrative.	
725.101(d)	Has the facility managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of Section 725.101(d)(1) through (5)? Yes____ No____ N/A____	725.101(d)
	SUBPART B: GENERAL FACILITY STANDARDS	
	Section 725.111 USEPA Identification Number	
725.111	Has the facility obtained a USEPA identification number? Yes X No____ N/A____	725.111
	Section 725.112 Required Notices	
	Has the owner/operator of the facility provided the required notices:	
725.112(a)	a) upon receiving hazardous waste from a foreign source? Yes____ No____ N/A X	725.112(a)
	On campus only	
725.112(b)	b) prior to transferring ownership/operational control of the facility? Yes____ No____ N/A X	725.112(b)
	Section 725.113 General Waste Analysis	
725.113(a)	Has the owner/operator obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes X No____ N/A____	
	Does the analysis contain all the necessary information to treat, store or dispose of the waste in accordance with Parts 725 and Part 728? Yes X No____ N/A____	
	Has the analysis been repeated:	
	- when the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes____ No____ N/A X	725.113(a)
	- for off-site facilities, when the results of an on-site inspection indicate that the hazardous waste received at the facility does not match the accompanying manifest or shipping paper? Yes____ No____ N/A X	
	Has the owner/operator of an off-site facility inspected each hazardous waste shipment received at the facility to ensure that it matches the waste identified on the accompanying manifest or shipping paper? Yes X No____ N/A____	
725.113(b)	Has the owner/operator developed a written waste analysis plan? Yes X No____ N/A____	
	Is the plan available at the facility? Yes X No____ N/A____	
	Does the owner/operator follow the procedures specified in the plan so as to comply with Section 725.113(a)? Yes X No____ N/A____	
	Does the plan specify:	
	1) the parameters for which each hazardous waste will be analyzed and the rationale for selecting these parameters? Yes X No____ N/A____	725.113(b)
	2) the test methods which will be used to test for these parameters? Yes X No____ N/A____	
	3) the sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes X No____ N/A____	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	4) the frequency with which the initial analysis of the waste will be reviewed or repeated to ensure accurate and up-to-date analysis? Yes X No N/A	
	5) for off-site facilities, the waste analyses that hazardous waste generators supply? Yes No N/A X	
	6) the methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections: - 725.300 (Tanks)? NA - 725.325 (Surface Impoundments)? NA - 725.352 (Waste Piles)? NA - 725.373 (Land Treatment)? NA - 725.414 (Landfills)? NA - 725.441 (Incinerators)? NA - 725.475 (Thermal Treatment)? NA - 725.502 (Chemical, Physical and Biological Treatment)? NA - 725.934(d) (Air Emissions - Process Vents)? NA - 725.963(d) (Air Emissions - Equipment Leaks)? NA - 725.984 (Air Emissions - Subpart CC)? - 728.107 (Land Disposal Restrictions)? Yes X No N/A **Note:** Circle appropriate Section.	
	7) for surface impoundments exempted from land disposal restrictions (LDR) under Section 728.104(a), the procedures and schedules for: - the sampling of impoundment contents - the analysis of test data; and - the annual removal of residues as specified in this Section? Yes No N/A X	
	8) for owners and operators seeking an exemption to the air emission standards of 724.Subpart CC in accordance with Section 725.983: - if direct measurement is used for the waste determination are schedules and procedures for waste sampling and analysis of test data to verify exemption being maintained? Yes No N/A X - if knowledge of the waste is being used to make this determination, is the documentation being maintained? Yes No N/A X	
725.113(c)	For off-site facilities, does the plan: 1) describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes X No N/A	
	2) describe the sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes X No N/A	725.113(c)
	3) describe the procedures that will be used to determine whether a hazardous waste generator or treater has added a biodegradable sorbent to the waste in the container? Yes No N/A X	
	Section 725.114 Security	
725.114(a)(b)	Does the facility qualify for the exemption to the requirement to provide security specified in Section 725.114(a)? Yes No X N/A Does a non-exempt facility have either : - a 24-hour surveillance system? Alarm & Motion detectors Yes No X N/A	725.114(a)(b)
	or - an artificial or natural barrier which completely surrounds the active portion of the facility; and Yes X No N/A	
	- gates or other entrances to the active portion of the facility Yes X No N/A	
725.114(c)	Does a non-exempt facility have a sign with the words "Danger - Unauthorized Personnel Keep Out" posted at each entrance to the active portion of the facility? Yes X No N/A on gates & outside doors	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	Note: Existing signs with legends other than the one above may be used if the legend indicates that access is restricted to authorized personnel only and that entry onto the active portion can be dangerous.	725.114(c)
	Section 725.115 General Inspection Requirements	
725.115(a)	Does the owner/operator inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or may lead to a release of hazardous waste constituents to the environment or a threat to human health or the environment? Yes X No N/A	
	Does the owner/operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Daily, weekly, monthly Yes X No N/A	725.115(a)
725.115(b)	Has the owner/operator developed and followed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes X No N/A	
	Is the written schedule kept at the facility? Yes X No N/A	
	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes X No N/A	
	Does the schedule specify at least the following minimum inspection frequency:	
	- daily inspections of areas subject to spills? Yes X No N/A	725.115(b)
	- the items and frequencies, where applicable, called for in Sections:	
	- 725.274 (Containers) – Daily	
	- 725.293 (Tanks) – NA	
	- 725.295 (Tanks) – NA	
	- 725.326 (Surface Impoundments) – NA	
	- 725.447 (Incinerators) – NA	
	- 725.477 (Thermal Treatment) – NA	
	- 725.503 (Chemical, Physical and Biological Treatment) – NA	
	- 725.933 (Air Emissions - Process Vents) – NA	
	- 725.952 (Air Emissions - Equipment Leaks) – NA	
	- 725.953 (Air Emissions - Equipment Leaks) – NA	
	- 725.958 (Air Emissions - Equipment Leaks) – NA	
	- 725.984 through 725.990 (Air Emissions - Subpart CC) Yes X No N/A	
	Note: Circle the applicable Section(s).	
725.115(c)	Has the owner/operator remedied any deterioration or malfunctions of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Worn Sealant Rm 101 Yes X No N/A	
	Has the owner/operator taken immediate remedial action to address an imminent or existing hazard? Yes No N/A X	725.115(c)
725.115(d)	Does the owner/operator record inspections in a log or summary? Yes X No N/A	
	Are these inspection records kept on file for at least 3 years from the date of the inspection? Yes X No N/A	
	Does the inspection record include, at a minimum:	
	- the date and time of the inspection? Not time Yes No X N/A	X
	- the name of the inspector? Yes X No N/A	725.115(d)
	- a notation of the observations made? Yes X No N/A	
	- the date and nature of any repairs or remedial actions? Yes X No N/A	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.116(a)	**Section 725.116 Personnel Training** Does the facility have a training program? Yes ✓ No ___ N/A ___ Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes ✓ No ___ N/A ___ Is the program directed by a person trained in hazardous waste management procedures? Yes ___ No ___ N/A ___ Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes ✓ No ___ N/A ___ Does the program cover, at a minimum: - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes ✓ No ___ N/A ___ - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No ___ N/A ___ - key parameters for automatic waste feed cut-off systems? Yes ___ No ___ N/A ✗ - communications or alarm systems? Yes ✓ No ___ N/A ___ - response to fire or explosions? Yes ✓ No ___ N/A ___ - response to groundwater contamination incidents? Yes ✓ No ___ N/A ___ - shutdown of operations? Yes ✓ No ___ N/A ___	725.116(a)
725.116(b)	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No ___ N/A ___	725.116(b)
725.116(c)	Have facility personnel received an annual review of the initial training? Yes ✓ No ___ N/A ___	725.116(c)
725.116(d)	Are the following documents and records being maintained at the facility: 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes ✓ No ___ N/A ___ 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No ___ N/A ___ 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes ✓ No ___ N/A ___ 4) records that document that the training or job experience has been given to and completed by facility personnel? Yes ✓ No ___ N/A ___	725.116(d)
725.116(e)	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes ✓ No ___ N/A ___	725.116(e)
725.117(a)	**Section 725.117 General Requirements for Ignitable, Reactive or Incompatible Wastes** Are ignitable and reactive wastes protected from and separated from sources of ignition or reaction? Yes ✗ No ___ N/A ___ Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ✗ No ___ N/A ___	725.117(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.117(b)	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or commingling of incompatible wastes and materials being done so as not to threaten human health or the environment (e.g. fire, pressure, toxic gases, etc...)? Yes X No_____ N/A_____	725.117(b)
	SUBPART C: PREPAREDNESS AND PREVENTION	
	Section 725.131 Maintenance and Operation of Facility	
725.131	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes X No_____ N/A_____	725.131
	Section 725.132 Required Equipment	
725.132	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes X No_____ N/A_____ b) a telephone or other device to summon emergency assistance from local authorities? Yes X No_____ N/A_____ c) portable fire extinguisher(s), fire control equipment, spill control equipment and decontamination equipment? Yes X No_____ N/A_____ d) water at adequate volume and pressure for fire control? Yes X No_____ N/A_____	725.132
	Section 725.133 Testing and Maintenance of Equipment	
725.133	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes X No_____ N/A_____	725.133
	Section 725.134 Access to Communications or Alarm System	
725.134	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes X No_____ N/A_____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes X No_____ N/A_____ No ops w/o 2 people 1 person: cells, landline, pull stations.	725.134
	Section 725.135 Required Aisle Space	
725.135	Is the facility maintaining adequate aisle space? Yes X No_____ N/A_____	725.135
	Section 725.137 Arrangements with Local Authorities	
725.137	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes X No_____ N/A_____ - agreements designating the primary authority where more than one police or fire department might respond? Yes X No_____ N/A_____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes X No_____ N/A_____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes X No_____ N/A_____	725.137

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
	Section 725.151 Purpose and Implementation of Contingency Plan	
725.151(a)	Is the contingency plan available? Yes X No ____ N/A ____	
	If "No", skip to Section 725.155.	725.151(a)
	Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes X No ____ N/A ____	
725.151(b)	Has there been a fire, explosion or release of hazardous waste? Yes ____ No X N/A ____	
	If "Yes", has the contingency plan been carried out immediately? Yes ____ No ____ N/A ____	725.151(b)
	Section 725.152 Content of Contingency Plan	
725.152(a)	Does the plan describe the actions required for response to:	
	- fires? Yes X No ____ N/A ____	725.152(a)
	- explosions? Yes X No ____ N/A ____	
	- releases? Yes X No ____ N/A ____	
725.152(c)	Does the plan describe arrangements with:	
	- police and fire departments? Yes X No ____ N/A ____	
	- hospitals? Yes X No ____ N/A ____	725.152(c)
	- contractors? Yes X No ____ N/A ____	
	- emergency response teams? Yes ____ No ____ N/A X	
725.152(d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes X No ____ N/A ____	725.152(d)
725.152(e)	Does the plan identify all emergency equipment including:	
	- description? Yes X No ____ N/A ____	
	- capability? Yes X No ____ N/A ____	725.152(e)
	- location? Yes X No ____ N/A ____	
	Is the list of emergency equipment up-to-date? Yes X No ____ N/A ____	
725.152(f)	Does the plan include:	
	- an evacuation plan? Yes X No ____ N/A ____	
	- an evacuation signal? Yes X No ____ N/A ____	725.152(f)
	- alternate evacuation routes? Yes X No ____ N/A ____	
	Section 725.153 Copies of Contingency Plan	
725.153	Has the contingency plan (including all revisions) been:	
	a) maintained at the facility? Yes X No ____ N/A ____	
	b) submitted to:	
	- police department? Yes X No ____ N/A ____	725.153
	- fire department? Yes X No ____ N/A ____	
	- hospital? Yes X No ____ N/A ____	
	- emergency response teams? Yes ____ No ____ N/A X	
	Section 725.154 Amendment of Contingency Plan	
725.154	Has the contingency plan been reviewed and revised whenever:	
	a) regulations are revised? Yes X No ____ N/A ____	
	b) the plan fails in an emergency? Yes ____ No ____ N/A X	
	c) the facility changes in a way that modifies the emergency response necessary? Yes ____ No ____ N/A X	725.154
	d) information regarding emergency coordinators changes? Yes X No ____ N/A ____	
	e) information regarding equipment changes? Yes X No ____ N/A ____	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.155	**Section 725.155 Emergency Coordinator** Is the emergency coordinator on-site or on call at all times? Yes X No N/A	
	Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes X No N/A	725.155
	Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes X No N/A	
725.156	**Section 725.156 Emergency Procedures** If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes No N/A X	725.156
	Note: If the facility has had a release, explain in detail.	
	SUBPART E: MANIFEST SYSTEM, RECORDKEEPING AND REPORTING	
725.171(a)	**Section 725.171 Use of Manifest System** Does the facility accept waste from off-site? Yes No X N/A	
	If "No", skip to Section 725.173.	
	For each manifest reviewed, did the facility: 1) sign and date each copy? Yes No N/A 2) note any discrepancies? Yes No N/A 3) give one copy to the transporter? Yes No N/A 4) send one copy to the generator and one copy to the Agency within 30 days? Yes No N/A 5) retain one copy for 3 years? Yes No N/A	725.171(a)
	Does the facility ship hazardous waste in bulk by water or rail? Yes No N/A	
	If "Yes", were the procedures in Section 725.171(b) followed? Yes No N/A	
	Does the facility initiate shipments of hazardous waste? Yes X No N/A ½ DFC	
	Note: If "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.	
725.171(d)	Has the owner/operator sent the required documentation to the USEPA within three working days of the receipt of a shipment subject to Section 722, Subpart H (Imports and Exports)? Yes No N/A	725.171(d)
725.172(d)	**Section 725.172 Manifest Discrepancies** Were manifest discrepancies observed? Yes No N/A	
	Has the owner/operator attempted to resolve discrepancies upon their discovery? Yes No N/A	725.172(d)
	If not resolved within 15 days, has the owner/operator notified the Agency? Yes No N/A	
725.173	**Section 725.173 Operating Record** a) Does the owner/operator have a written operating record at the facility? Yes X No N/A	
	b) Is the information recorded as it becomes available and maintained until closure? Yes X No N/A	725.173
	b) Does the operating record contain the following: 1) description and quantity of each hazardous waste and the methods and dates of ~~treatment,~~ storage and ~~disposal~~ shipping? Yes X No N/A	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation

2) location and quantity of each hazardous waste within the facility?
Yes X No_____ N/A_____
- for disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area?
Yes_____ No_____ N/A X

3) records and results of waste analyses and trial tests performed as specified in the identified Sections?
Yes X No_____ N/A_____

4) summary reports and details of all incidents requiring contingency plan implementation?
Yes_____ No_____ N/A_____

5) inspection records [see Section 725.115(d)]?
Yes X No_____ N/A_____

6) monitoring, testing or analytical data as required by:
- 725.190 (Groundwater Monitoring) NA
- 725.194 (Groundwater Monitoring) NA
- 725.376 (Land Treatment) NA
- 725.378 (Land Treatment) NA
- 725.380(d)(1) (Land Treatment) NA
- 725.447 (Incinerators) NA NA
- 725.477 (Thermal Treatment)
- 725.934(c) through (f) (Air Emissions - Process Vents)
- 725.935 (Air Emissions - Process Vents)
- 725.963(d) through (i) (Air Emissions - Equipment Leaks)
- 725.964 (Air Emissions - Equipment Leaks)
- 725.983 through 725.990

NA

Yes_____ No_____ N/A X

Note: Circle appropriate Section.

7) all closure cost estimates under Section 725.242?
Yes X No_____ N/A_____
for disposal facilities, all post-closure cost estimates under Section 725.244?
Yes_____ No_____ N/A X

8) records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units under an extension of the effective date of land disposal restrictions under Section(s) 728.105, 728.106, 728.108 and 728.107(a)?
Yes_____ No_____ N/A X

9) for an off-site treatment facility, a copy of the notice, and certification and demonstration, required under Section 728.107 or 728.108?
Yes_____ No_____ N/A X

10) for an on-site treatment facility, the information contained in the notice, and certification and demonstration, required under Section 728.107 or 728.108?
Yes_____ No_____ N/A X

11) for an off-site land disposal facility, a copy of the notice, and certification and demonstration, required under Section 728.107 or 728.108?
Yes_____ No_____ N/A X

12) for an on-site land disposal facility, the information contained in the notice required of the generator or treatment facility under Section 728.107, except for the manifest numbers, and the certification and demonstration required under Section 728.107 or 728.108, if applicable?
Yes_____ No_____ N/A X

13) for an off-site storage facility, a copy of the notice, and certification and demonstration, required under Section 728.107 or 728.108?
Yes_____ No_____ N/A X

14) For an on-site storage facility, the information contained in the notice, and the certification and demonstration if applicable, required under Section 728.107 or 728.108?
Yes X No_____ N/A_____

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.174(a)	**Section 725.174 Availability, Retention and Disposition of Records** Were all records and plans required under Part 725 made available for inspection? Yes X No ____ N/A ____ Have all records been maintained during any unresolved enforcement action or as requested by the Director? Yes ____ No ____ N/A X Upon closure of a land disposal facility, was the record of waste disposal location and quantities submitted to: - the Agency? Yes ____ No ____ N/A ____ - the local land authority? Yes ____ No ____ N/A ____	725.174(a)
725.175	**Section 725.175 Annual Report** Has the owner/operator submitted an annual report by March 1 of each year? Yes X No ____ N/A ____	725.175
725.176	**Section 725.176 Unmanifested Waste Report** Does the facility accept hazardous waste from off-site? Yes ____ No X N/A ____ If "No", skip to Section 725.177. Has the facility accepted waste from off-site for treatment, storage or disposal without a manifest or shipping papers? Yes ____ No ____ N/A ____ Was the unmanifested waste exempt per Section 721.105? Yes ____ No ____ N/A ____ Did the owner/operator complete an unmanifested waste report in accordance with the requirements of this Section? Yes ____ No ____ N/A ____	725.176
725.177	**Section 725.177 Additional Reports** Has the owner/operator also reported to the Agency: a) releases, fires and explosions as specified in Section 725.156(j)? Yes ____ No ____ N/A X b) groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A X c) facility closure as specified in Section 725.215? Yes X No ____ N/A ____ d) as otherwise required by Subparts AA, BB and CC of Part 725? Yes ____ No ____ N/A X COMMENTS: c) Other campus areas, but included in Permit.	725.177

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	SUBPART G: CLOSURE AND POST-CLOSURE	
	Section 725.212 Closure Plan; Amendment of Plan	
725.212(a)	Was the most current facility closure plan available during the inspection? 2005 Yes X No_____ N/A_____	725.212(a)
	Was the closure plan submitted to the Agency within the time frames specified in this Section? Yes X No_____ N/A_____	
	Section 725.218 Post-Closure Care Plan	
725.218(a)	Was the most current facility post-closure plan available during the inspection? Yes_____ No_____ N/A X	725.218(a)
	Was the post-closure plan submitted to the Agency within the time frames specified in this Section? Yes_____ No_____ N/A X	
	SUBPART H: FINANCIAL REQUIREMENTS	
	Section 725.242 Cost Estimate for Closure	
725.242(a)	Has the owner/operator prepared a written estimate of the cost of closing the facility? Requires update Yes X No_____ N/A_____	725.242(a)
	Section 725.244 Cost Estimate for Post-Closure Care	
725.244(a)	Has the owner/operator prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? Yes_____ No_____ N/A X	
	Comments: No monitoring expected	725.244(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
	Section 725.271 Condition of Containers	
725.271	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes____ No____ N/A_X_	725.271
	Section 725.272 Compatability of Waste with Container	
725.272	Is the waste compatible with the container and/or liner? Yes_X_ No____ N/A____	725.272
	Section 725.273 Management of Containers	
725.273(a)	Are containers of hazardous waste always closed except to remove or add waste during storage? Yes_X_ No____ N/A____	725.273(a)
725.273(b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes_X_ No____ N/A____	725.273(b)
	Section 725.274 Inspections	
725.274	Is the owner/operator inspecting the storage area(s) at least weekly, looking for leaks or deterioration? Yes_X_ No____ N/A____ Is the storage area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes____ No____ N/A____	725.274
	Section 725.276 Special Requirements for Ignitable or Reactive Waste	
725.276	Are containers holding hazardous waste located at least 15 meters (50 feet) from the facility's property line? Yes_X_ No____ N/A____	725.276
	Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
	Section 725.277 Special Requirements for Incompatible Wastes	
725.277	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes_X_ No____ N/A____	725.277
	Comments: - All containers closed - Weekly container inspection log - Separate rooms / cabinets for incompatible wastes	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.278	**Section 725.278 Air Emission Standards** Is the owner or operator managiing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes X No_____ N/A_____ Comments: CC level 1	725.278
	SUBPART J: TANK SYSTEMS	
725.290	**Section 725.290 Applicability** Does the facility store or treat hazardous waste in tanks? Yes_____ No X N/A \ If "No", skip Subpart J. a) Tank systems that are used to store or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	
725.291(a)	**Section 725.291 Assessment of Existing Tank Systems** For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes_____ No_____ N/A_____	725.291(a)
725.291(b)	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the wastes? Yes_____ No_____ N/A_____ 3) existing corrosion protection measures? Yes_____ No_____ N/A_____ 4) documented age of the tank system? Yes_____ No_____ N/A_____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes_____ No_____ N/A_____	725.291(b)
725.291(c)	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes_____ No_____ N/A_____ **Note:** If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	725.291(c)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.292(a)	**Section 725.292 Design and Installation of New Tank Systems or Components** For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 7/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes_____ No_____ N/A_____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the waste(s) to be handled? Yes_____ No_____ N/A_____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes_____ No_____ N/A_____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes_____ No_____ N/A_____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes_____ No_____ N/A_____ * IRPE = Independent Registered Professional Engineer	725.292(a)
725.292(g)	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes_____ No_____ N/A_____	725.292(g)
725.293(a)	**Section 725.293 Containment and Detection of Releases** Is secondary containment provided for any new tank system before being put into service? Yes_____ No_____ N/A_____ Does an existing tank, used to store F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes_____ No_____ N/A_____ For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes_____ No_____ N/A_____ For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes_____ No_____ N/A_____ or If the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes_____ No_____ N/A_____ For tanks that store wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes_____ No_____ N/A_____	725.293(a)
725.293(b)	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes_____ No_____ N/A_____ Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes_____ No_____ N/A_____	725.293(b)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.293(c)	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes_____ No_____ N/A_____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes_____ No_____ N/A_____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes_____ No_____ N/A_____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes_____ No_____ N/A_____ and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes_____ No_____ N/A_____ **Note:** A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	725.293(c)
725.293(d)	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes_____ No_____ N/A_____	725.293(d)
725.293(e)	Does the external liner system(s), vault system(s) and/or double-walled tanks meet the additional requirements identified in Section 725.293(e)? Yes_____ No_____ N/A_____	725.293(e)
725.293(f)	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c) except for: 1) aboveground piping (exclusive of flanges, joints, valves and connections) that are inspected daily? Yes_____ No_____ N/A_____ 2) welded flanges, joints and connections that are inspected daily? Yes_____ No_____ N/A_____ 3) sealless or magnetic coupling pumps and sealless valves that are inspected daily? Yes_____ No_____ N/A_____ 4) pressurized aboveground piping systems with automatic shut-off devices that are inspected daily? Yes_____ No_____ N/A_____	725.293(f)
725.293(i)	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes_____ No_____ N/A_____ 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes_____ No_____ N/A_____ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes_____ No_____ N/A_____ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	725.293(i)
725.294(a)	**Section 725.294 General Operating Requirements** Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes_____ No_____ N/A_____	725.294(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.294(b)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes_____ No_____ N/A_____	
	2) overfill prevention controls? Yes_____ No_____ N/A_____	725.294(b)
	3) sufficient freeboard in uncovered tanks? Yes_____ No_____ N/A_____	
725.294(c)	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
	Section 725.295 Inspections	
725.295(a)	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes_____ No_____ N/A_____	
	2) the aboveground portion of the tank system for corrosion or releases? Yes_____ No_____ N/A_____	725.295(a)
	3) data from monitoring equipment? Yes_____ No_____ N/A_____	
	4) the construction materials and the area immediately surrounding the external portion of the system? Yes_____ No_____ N/A_____	
725.295(b)	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes_____ No_____ N/A_____	725.295(b)
725.295(c)	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes_____ No_____ N/A_____	725.295(c)
	Section 725.296 Response to Leaks or Spills and Disposition of Tank Systems	
725.296	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes_____ No_____ N/A_____	
	b) removed applicable waste from the system within 24 hours of detection? Yes_____ No_____ N/A_____	725.296
	c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes_____ No_____ N/A_____	
725.296(d)	d) notified the Agency within 24 hours of detection of release? Yes_____ No_____ N/A_____	
	d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes_____ No_____ N/A_____	725.296(d)
	Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.296(e)	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes_____ No_____ N/A_____ e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes_____ No_____ N/A_____ e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes_____ No_____ N/A_____ e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes_____ No_____ N/A_____	
	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous waste without release for the intended life of the system? Yes_____ No_____ N/A_____	725.296(e)
	Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
	Section 725.297 Closure and Post-Closure Care	
725.297(a)	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes_____ No_____ N/A_____	725.297(a)
725.297(a)	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes_____ No_____ N/A_____	
725.297(b)	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes_____ No_____ N/A_____	725.297(b)
	Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	
725.297(c)	If the owner/operator has a tank system which does not have secondary containment that meets the requirements of Section 725.293(b) through (f), and which is not exempt from the secondary containment requirements in accordance with Section 725.293(g), has the owner/operator complied with items 1) through 5) in this Section? Yes_____ No_____ N/A_____	725.297(c)
	Section 725.298 Special Requirements for Ignitable or Reactive Waste	
725.298(a)	Are ignitable or reactive wastes placed in a tank system? Yes_____ No_____ N/A_____ If "No", skip to Section 725.299. Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes_____ No_____ N/A_____ - Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ or Is the waste stored or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes_____ No_____ N/A_____ or Is the tank used solely for emergencies? Yes_____ No_____ N/A_____	725.298(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.298(b)	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line (see NFPA 30)? Yes_____ No_____ N/A_____	725.298(b)
	Section 725.299 Special Requirements for Incompatible Wastes	
725.299	Are incompatible wastes/materials placed in the same tank? Yes_____ No_____ N/A_____ If "No", skip to Section 725.300.	
	Is the facility in compliance with Section 725.117(b)? Yes_____ No_____ N/A_____	725.299
	Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless the facility is in compliance with Section 725.117(b)? Yes_____ No_____ N/A_____	
	Section 725.300 Waste Analysis and Trial Tests	
725.300	Has the owner/operator performed additional waste analyses/trial tests as required in this Section whenever a tank system is to be used to chemically treat or store a hazardous waste that is substantially different from waste previously treated or stored in that tank system; or to chemically treat a hazardous waste with a substantially different process than any previously used in that tank system? Yes_____ No_____ N/A_____	725.300
	Comments:	
	Section 725.302 Air Emission Standards	
725.302	Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A_____	
	Comments:	725.302

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.321(a)	**SUBPART K: SURFACE IMPOUNDMENTS** **Section 725.321 Design and Operating Requirements** Has the owner/operator complied with Section 724.321(c) for liners and leachater collection systems for each new or replacement unit, or lateral expansion of an existing unit? Yes_____ No X N/A_____	725.321(a)
725.321(b)	Has the owner/operator notified the Agency at least 60 days prior to receiving waste and filed a Part B permit application within 6 months of such notice? Yes_____ No_____ N/A_____	725.321(b)
	Note: If N/A is checked, provide a detailed explanation of why the facility is not subject to the requirements of Section 725.321(c) or (d) and skip to Section 725.322.	
725.321(f)	Does the surface impoundment have at least two feet of freeboard unless a certification is conducted in accordance with subsection (b)? Yes_____ No_____ N/A_____	725.321(f)
725.321(h)	Has the surface impoundment that is newly subject to this Part due to additional listings or characteristics, complied with subsections 725.321(a), (c) or (d) within 48 months after the promulgation of the new listing or characteristic? Yes_____ No_____ N/A_____	725.321(h)
725.322(a)(b)	**Section 725.322 Action Leakage Rates** Has the owner/operator submitted an adequate proposed action leakage rate to the Agency? Yes_____ No_____ N/A_____	725.322(a)(b)
725.322(c)	Has the owner/operator determined if the action leakage rate has been exceeded? Yes_____ No_____ N/A_____	725.322(c)
725.323(a)	**Section 725.323 Response Action** Has the owner/operator submitted an adequate response action to the Agency? Yes_____ No_____ N/A_____	725.323(a)
725.323(b)	If the flow rate into the leak detection system (LDS) exceeds the action leakage rate for any sump, has the owner/operator complied with Subsection 725.323(b)? Yes_____ No_____ N/A_____	725.323(b)
725.323(c)	To make the leak or remediation determinations in Subsections 725.323(b)(3), (4) and (5), has the owner/operator complied with Subsection 725.323(c)? Yes_____ No_____ N/A_____	725.323(c)
725.324	**Section 725.324 Containment System** Are all earthen dikes covered with grass, shale or rock to minimize wind and water erosion and to preserve their structural integrity? Yes_____ No_____ N/A_____	725.324
725.325	**Section 725.325 Waste Analysis and Trial Tests** Prior to using a surface impoundment to chemically treat a hazardous waste which is substantially different from waste previously treated in the surface impoundment, or chemically treat hazardous waste with a substantially different process than any previously used in that impoundment, has the owner/operator: 1) conducted waste analysis or trail treatment tests? Yes_____ No_____ N/A_____ 2) obtained written, documented information on similar operating conditions to show that this treatment will comply with Section 725.117(b)? Yes_____ No_____ N/A_____	725.325
725.326	**Section 725.326 Monitoring and Inspections** Has the owner/operator inspected: 1) the freeboard level daily to ensure compliance with Section 725.322? Yes_____ No_____ N/A_____ 2) the surface impoundment at least once a week? Yes_____ No_____ N/A_____	725.326

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	Section 725.328 Closure and Post-Closure Care **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection.	
725.328	Has the owner/operator closed the surface impoundment in accordance with an approved closure plan? Yes_____ No_____ N/A_____ Has the owner/operator followed an approved post-closure plan? Yes_____ No_____ N/A_____	725.328
	Section 725.329 Special Requirements for Ignitable or Reactive Wastes	
725.329	Has the impoundment been used solely for emergencies? Yes_____ No_____ N/A_____ If not, has the addition of ignitable or reactive waste to the impoundment been conducted in accordance with this Section? Yes_____ No_____ N/A_____	725.329
	Section 725.330 Special Requirements for Incompatible Wastes	
725.330	Has the owner/operator complied with the requirements concerning the management of incompatible wastes and materials contained in this Section? Yes_____ No_____ N/A_____	725.330
	Section 725.331 Air Emission Standards	
725.331	Is the owner or operator managing all hazardous waste placed in surface impoundments in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A_____ Comments:	725.331
	SUBPART L: WASTE PILES	
	Section 725.351 Protection from Wind	
725.351	If the waste pile is subject to wind dispersal, has the owner/operator covered or managed the pile so that dispersal is controlled? Yes_____ No X N/A_____	725.351
	Section 725.352 Waste Analysis	
725.352(a)	If required, are wastes analyzed for compatibility prior to being added to the pile? Yes_____ No_____ N/A_____	725.352(a)
725.352(b)	Is the analysis conducted capable of differentiating (i.e. visual comparison of color and texture) between the types of hazardous waste the owner/operator places in the pile so that the mixing of incompatible wastes does not occur? Yes_____ No_____ N/A_____	725.352(b)
	Section 725.353 Containment	
725.353(a)	If leachate or runoff is a hazardous waste, has the owner/operator: 1) placed the pile on an impermeable base that is compatible with the waste? Yes_____ No_____ N/A_____ 2) designed, constructed, operated and maintained an adequate run-on control system? Yes_____ No_____ N/A_____ 3) designed, constructed, operated and maintained an adequate run-off management system? Yes_____ No_____ N/A_____ 4) emptied or otherwise managed expeditiously the run-on/run-off collection and holding facilities? Yes_____ No_____ N/A_____	725.353(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.353(b)	Is the pile protected from precipitation and run-on? Yes_____ No_____ N/A_____ Have liquids and wastes containing free liquids been placed in the pile? Yes_____ No_____ N/A_____	725.353(b)
	Note: If collected leachate or run-off is discharged to waters of the State, it is subject to the requirements of Section 12 of the Act as amended.	
	Section 725.354 Design Requirements	
725.354	Has the owner/operator met the requirements for liners and leachate collection systems prescribed in Section 724.351? Yes_____ No_____ N/A_____	725.354
	Section 725.356 Special Requirements for Ignitable and Reactive Waste	
725.356	Has the addition of ignitable or reactive waste to the pile been conducted in accordance with this Section? Yes_____ No_____ N/A_____	725.356
	Section 725.357 Special Requirements for Incompatible Wastes	
725.357	Has the owner/operator complied with the requirements concerning the management of incompatible wastes or incompatible wastes and materials unless Section 725.117(b) is complied with? Yes_____ No_____ N/A_____	725.357
	Section 725.358 Closure and Post-Closure Care	
	Note: Determine compliance with this Section only in conjunction with a closure verification inspection.	
725.358	Has the facility been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.358
	SUBPART M: LAND TREATMENT	
	Section 725.372 General Operating Requirements	
725.372	a) Can the waste being placed in or on the land treatment facility be made less hazardous or non-hazardous? Yes_____ No_____ N/A_____	
	b) Has the owner/operator designed, constructed, operated and maintained an adequate run-on control system? Yes_____ No_____ N/A_____	725.372
	c) Has the owner/operator designed, constructed, operated and maintained an adequate run-off management system? Yes_____ No_____ N/A_____	
	d) Has the owner/operator emptied or otherwise managed expeditiously the run-on/run-off collection and holding facilities? Yes_____ No_____ N/A_____	
	e) If the treatment zone contains particulate matter which may be subject to wind dispersal, is the owner/operator managing the unit to control wind dispersal? Yes_____ No_____ N/A_____	
	Section 725.373 Waste Analysis	
725.373	Prior to placing hazardous waste in or on a land treatment facility, has the owner/operator: a) determined the concentration of any substances which exceed the maximum concentrations contained in Table 1 of Section 724.124? Yes_____ No_____ N/A_____	
	b) determined the concentration of any substances which caused the waste to be listed as a hazardous waste in Part 721, Subpart D? Yes_____ No_____ N/A_____	725.373
	c) if food chain crops are grown, determined the concentrations in the waste of arsenic, cadmium, lead and mercury, unless the owner/operator has written documented data that show that the constituent is not present? Yes_____ No_____ N/A_____	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.376	**Section 725.376 Food Chain Crops** If food chain crops are or will be grown, has the owner/operator made the required notice under Section 725.376(a)? Yes_____ No_____ N/A_____	
	Has the owner/operator complied with the requirements of Section 725.376(b) and (c) concerning the growing of food chain crops on land treatment facilities? Yes_____ No_____ N/A_____	725.376
725.378	**Section 725.378 Unsaturated Zone (Zone of Aeration) Monitoring** Does the owner/operator have a written unsaturated zone monitoring plan (maintained at the facility) as specified in this Section? Yes_____ No_____ N/A_____	
	Has the owner/operator implemented the unsaturated zone monitoring plan? Yes_____ No_____ N/A_____	725.378
725.379	**Section 725.379 Recordkeeping** Has the owner/operator included the dates and rates of application of hazardous waste in the operating record? Yes_____ No_____ N/A_____	725.379
725.380	**Section 725.380 Closure and Post-Closure** **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection. Has the land treatment facility been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.380
725.381	**Section 725.381 Special Requirements for Ignitable or Reactive Wastes** Has the application of ignitable or reactive waste to the treatment zone been conducted in accordance with this Section? Yes_____ No_____ N/A_____	725.381
725.382	**Section 725.382 Special Requirements for Incompatible Wastes** Has the owner/operator complied with the requirements concerning the management of incompatible wastes or incompatible wastes and materials unless Section 725.117(b) is complied with? Yes_____ No_____ N/A_____	725.382
	SUBPART N: LANDFILLS	
725.401	**Section 725.401 Design Requirements** a) Has the owner/operator met the requirements for liners and leachate collection systems installed in accordance with Section 724.401 for each new unit, lateral expansion of a unit, and each replacement of an existing unit or lateral expansion? Yes_____ No_____ N/A_____ b) Has the owner/operator of each unit referred to in subsection (a) above notified the Agency at least 60 days prior to receiving waste? Yes_____ No_____ N/A_____ Has the owner/operator of each facility submitting notice filed a Part B application within 6 months of the receipt of such notice? Yes_____ No_____ N/A_____ f) Has the owner/operator designed, constructed, operated and maintained an adequate run-on control system? Yes_____ No_____ N/A_____ g) Has the owner/operator designed, constructed, operated and maintained an adequate run-off management system? Yes_____ No_____ N/A_____ h) Has the owner/operator emptied or otherwise managed expeditiously the run-on/run-off collection and holding facilities? Yes_____ No_____ N/A_____ i) If the landfill contains hazardous waste which may be subject to wind dispersal, is the owner/operator managing the unit to control wind dispersal? Yes_____ No_____ N/A_____	725.401
725.402(a)	**Section 725.402 Action Leakage Rates** Has the owner/operator submitted an adequate proposed action leakage rate to the Agency? Yes_____ No_____ N/A_____	725.402(a)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.402(c)	Has the owner/operator determined if the action leakage rate has been exceeded? Yes_____ No_____ N/A_____	725.402(c)
	Section 725.403 Response Actions	
725.403(a)	Has the owner/operator submitted an adequate proposed action leakage rate to the Agency? Yes_____ No_____ N/A_____	725.403(a)
725.403(b)	If the flow rate into the leak detection system (LDS) exceeds the action leakage rate for any sump, has the owner/operator complied with subsection 725.403(b)? Yes_____ No_____ N/A_____	725.403(b)
725.403(c)	To make the leak or remediation determination in subsections 725.403(b)(3), (4) and (5), has the owner/operator complied with subsection 725.403(c)? Yes_____ No_____ N/A_____	725.403(c)
	Section 725.404 Monitoring and Inspection	
725.404(a)	Has the owner/operator recorded the amount of liquids removed from each LDS sump at least once a week during the active and closure period? Yes_____ No_____ N/A_____	725.404(a)
725.404(b)	Has the owner/operator recorded the amount of liquids removed from each sump after final cover is installed, according to subsection 725.404(b)? Yes_____ No_____ N/A_____	725.404(b)
	Section 725.409 Surveying and Recordkeeping	
725.409	Has the owner/operator maintained the following in the facility's operating record: a) a map showing the exact location and dimensions, including depth of each cell with respect to permanently surveyed bench marks; and Yes_____ No_____ N/A_____ b) the contents of each cell and the approximate location of each hazardous waste type within each cell? Yes_____ No_____ N/A_____	725.409
	Section 725.410 Closure and Post-Closure **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection.	
725.410(a)	Has the landfill been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.410(a)
725.410(b)	Has the owner/operator conducted post-closure care and monitoring in accordance with an approved post-closure plan? Yes_____ No_____ N/A_____	725.410(b)
	Section 725.412 Special Requirements for Ignitable and Reactive Waste **Note:** Refer to Section 725.416 for the requirements for the disposal of small containers of hazardous waste in overpacked drums (lab packs).	
725.412	Have ignitable or reactive wastes been treated, rendered or mixed before or immediately after placement in the landfill so that the resulting waste, mixture or dissolution or material no longer meets the definition of ignitable or reactive waste in 721.121 or 721.123 and complies with Section 725.117(b)? Yes_____ No_____ N/A_____ Have ignitable wastes in containers been disposed of in the landfill so that they: 1) are handled and placed so as to avoid heat, sparks, rupture or any other condition which might cause ignition? Yes_____ No_____ N/A_____ 2) are covered daily with soil or other non-combustible material to minimize potential ignition of the waste? Yes_____ No_____ N/A_____ 3) are not disposed of in cells that contain or will contain other wastes which may generate heat sufficient to cause ignition of the waste? Yes_____ No_____ N/A_____ Are containers of ignitable waste disposed of in the landfill non-leaking? Yes_____ No_____ N/A_____	725.412

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.413	**Section 725.413 Special Requirements for Incompatible Wastes** Has the owner/operator complied with the requirements of 725.117(b) in regard to landfilling of incompatible wastes or incompatible wastes and containers? Yes_____ No_____ N/A_____	725.413
725.414(b)	**Section 725.414 Special Requirements for Liquid Wastes** Has the owner/operator placed bulk or non-containerized liquid hazardous waste or hazardous waste containing free liquids (whether or not absorbents have been added) in the landfill? Yes_____ No_____ N/A_____	725.414(b)
725.414(c)	Have containers holding free liquids complied with the requirements in 725.414(c) prior to being placed in the landfill? Yes_____ No_____ N/A_____	725.414(c)
725.414(d)	Has the owner/operator used the Paint Filter Liquid Test as described in SW-846 to demonstrate the presence or absence of free liquids in either a containerized or bulk liquid? Yes_____ No_____ N/A_____	725.414(d)
725.414(e)	Has any liquid which is not a hazardous waste been placed in the landfill? Yes_____ No_____ N/A_____ **Note:** A "Yes" answer indicates non-compliance with this Section and with Section 729.311.	725.414(e)
725.414(f)	Are the sorbents used to treat free liquids to be disposed of in a landfill non-biodegradable? Yes_____ No_____ N/A_____	725.414(f)
725.414(g)	Has the owner/operator obtained authorization pursuant to Section 709.401(a) for the disposal of liquid wastes or wastes containing free liquids? Yes_____ No_____ N/A_____ **Note:** See also Section 709.520(c).	725.414(g)
725.415	**Section 725.415 Special Requirements for Containers** Are the containers, unless very small, such as an ampule, being placed in the landfill: a) at least 90% full? Yes_____ No_____ N/A_____ b) crushed, shredded or similarly reduced in volume to the maximum extent practical? Yes_____ No_____ N/A_____	725.415
725.416	**Section 725.416 Disposal of Small Containers of Hazardous Waste in Overpacked Drums (Lab Packs)** Have the lab packs been placed in a landfill in accordance with Section 725.416(a) through (g)? Yes_____ No_____ N/A_____	725.416
	SUBPART O: INCINERATORS **Section 725.440 Applicability** **Note:** If the owner/operator claims to be exempt from the requirements of this Subpart and has documented in writing that the waste to be burned is identified in subsection (b) and that it would not reasonably be expected to contain any of the hazardous constituents listed in Part 721, Appendix H, then the facility is not regulated under this Subpart, except for Section 725.451 (Closure).	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.441	**Section 725.441 Waste Analysis** Has the owner/operator obtained analyses of wastes prior to the first time they are burned in the incinerator to enable him to establish steady state operating conditions and to determine the types of pollutants which might be emitted? Yes_____ No_____ N/A_____ Does the waste analysis include at least: a) heating value of the waste? Yes_____ No_____ N/A_____ b) halogen and sulfur content of the waste? Yes_____ No_____ N/A_____ c) lead and mercury content of the waste, unless written documentation is present to show that the elements are not present? Yes_____ No_____ N/A_____ **Note:** As required by Section 725.173, the owner/operator must place the results from each waste analysis or the documented information in the operating record of the facility.	725.441
725.445	**Section 725.445 General Operating Requirements** Are wastes fed to the incinerator only when it is at steady state (normal) conditions of operation, including temperature and air flow? Yes_____ No_____ N/A_____	725.445
725.447	**Section 725.447 Monitoring and Inspections** Has the owner/operator conducted the following monitoring and inspections when incinerating hazardous waste: a) existing instruments which relate to combustion and emission control every 15 minutes? Yes_____ No_____ N/A_____ b) the complete incinerator and associated equipment (pumps, valves, conveyors, pipes, etc.) at least daily for leaks, spills and fugitive emissions and all emergency shutdown controls and system alarms to assure proper operations? Yes_____ No_____ N/A_____	725.447
725.451	**Section 725.451 Closure** **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection. Has the incinerator been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____ **Note:** The incinerator may also be a generator of hazardous waste.	725.451
725.452	**Section 725.452 Interim Status Incinerators Burning Particular Hazardous Wastes** Prior to burning hazardous waste numbers F020, F021, F022, F023, F026 or F027, has the owner/operator received a certification from the Agency that they meet the performance standards of Part 724, Subpart O, and have they followed the procedures in Section 725.452(b)(1)? Yes_____ No_____ N/A_____	725.452
	SUBPART P: THERMAL TREATMENT	
725.473	**Section 725.473 General Operating Requirements** Are wastes fed into the thermal treatment process only when it is at a steady state (normal) condition of operation, including temperature? Yes_____ No_____ N/A_____ Are batch processes fed only after a complete thermal cycle? Yes_____ No_____ N/A_____	725.473

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.475	**Section 725.475 Waste Analysis** Has the owner/operator obtained analyses of wastes prior to the first time they are thermally treated to enable him to establish steady state operating conditions and to determine the types of pollutants which might be emitted? Yes_____ No_____ N/A_____ Does the waste analysis include at least: a) heating value of the waste? Yes_____ No_____ N/A_____ b) halogen and sulfur content of the waste? Yes_____ No_____ N/A_____ c) lead and mercury content of the waste, unless written documentation is present to show that the elements are not present? Yes_____ No_____ N/A_____	725.475
725.477	**Section 725.477 Monitoring and Inspection** Has the owner/operator conducted the following monitoring and inspections when thermally treating hazardous waste: a) existing instruments which relate to combustion and emission control every 15 minutes? Yes_____ No_____ N/A_____ b) the stack plume emissions at least hourly for normal appearance (color and opacity)? Yes_____ No_____ N/A_____ c) the complete thermal treatment process and associated equipment (pumps, valves, conveyors, pipes, etc.) at least daily for leaks, spills and fugitive emissions and all emergency shutdown controls and system alarms to assure proper operations? Yes_____ No_____ N/A_____	725.477
725.481	**Section 725.481 Closure** **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection. Has the thermal treatment unit been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.481
725.482	**Section 725.482 Open Burning; Waste Explosives** Does the owner/operator open burn waste explosives in accordance with this Section? Yes_____ No_____ N/A_____	725.482
725.483	**Section 725.483 Interim Status Thermal Treatment Devices Burning Particular Hazardous Wastes** Has the owner/operator of a thermal treatment process burning hazardous waste numbers F020, F021, F022, F023, F026 or F027 received a certification from the Agency that they can meet the performance standards of Part 724, Subpart O? Yes_____ No_____ N/A_____	725.483
	SUBPART Q: CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT	
	Section 725.500 Applicability **Note:** Chemical physical and biological treatment of hazardous waste in tanks, surface impoundments and land treatment facilities must be conducted in accordance with Subparts J, K and M respectively. Facilities that treat hazardous waste by chemical, physical and biological methods in other than tanks, surface impoundments and land treatment facilities are subject to the regulations of this Subpart.	
725.501	**Section 725.501 General Operating Requirements** Is the chemical, physical or biological treatment of hazardous waste being conducted in compliance with Section 725.117(b)? Yes_____ No_____ N/A_____ Are only hazardous waste treatment reagents which will not cause the treatment process or equipment to rupture, leak, corrode or otherwise fail before the end of its intended life being placed in the treatment process or equipment? Yes_____ No_____ N/A_____ Where hazardous waste is continuously fed into a treatment process or equipment, is the process or equipment equipped with a means to stop this inflow? Yes_____ No_____ N/A_____	725.501

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.502	**Section 725.502 Waste Analysis and Trial Tests** Has the process, equipment or hazardous waste being treated changed? Yes_____ No_____ N/A_____ If "Yes", has the owner/operator: 1) conducted a waste analysis and trial treatment tests (e.g., bench scale or pilot plant scale tests)?; or Yes_____ No_____ N/A_____ 2) obtained written documented information on similar treatment of similar waste under similar operating conditions? Yes_____ No_____ N/A_____	725.502
725.503	**Section 725.503 Inspections** Is the owner/operator inspecting, where present: a) discharge control equipment and safety equipment at least once each operating day? Yes_____ No_____ N/A_____ b) data gathered from monitoring equipment at least once each operating day? Yes_____ No_____ N/A_____ c) the construction materials of the treatment process or equipment at least weekly to detect corrosion or leaking of fixtures or seams? Yes_____ No_____ N/A_____ d) the construction materials of, and the area immediately surrounding discharge confinement structures at least weekly to detect erosion or obvious signs of leakage? Yes_____ No_____ N/A_____	725.503
725.504	**Section 725.504 Closure** **Note:** Determine compliance with this Section only in conjunction with a closure verification inspection. Has the chemical, physical or biological treatment unit been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____	725.504
725.505	**Section 725.505 Special Requirements for Ignitable or Reactive Wastes** Has the owner/operator complied with this Section for ignitable and/or reactive wastes? Yes_____ No_____ N/A_____	725.505
725.506	**Section 725.506 Special Requirements for Incompatible Wastes** Has the owner/operator complied with this Section for incompatible wastes? Yes_____ No_____ N/A_____ Comments:	725.506

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	SUBPART R: UNDERGROUND INJECTION	
	Section 725.530 Applicability	
725.530	Has the owner/operator disposed of hazardous waste in a Class I [as defined in Section 704.106(a)] or Class IV [as defined in Section 704.106(d)] injection well that meets the requirements of this Subpart? Yes_____ No_____ N/A_____	725.530
	Note: In addition to the requirements of Subparts A through E of this Part, the owner/operator of a facility that disposes of hazardous waste by underground injection ultimately must comply with the requirements of Sections 725.531 through 725.537 which are reserved at this time. USEPA intends to submit proposed regulations at a later date that would establish those requirements.	
	SUBPART W: DRIP PADS	
	Section 725.541 Assessment of Existing Drip Pad Integrity **Note:** Existing drip pads are those constructed before December 6, 1990.	
725.541(a)	Has the owner/operator of an existing drip pad made an evaluation of the drip pad to determine that it meets all requirements of this Subsection, except the requirements for liners and leak detection systems of Section 725.543(b)? Yes_____ No_____ N/A_____ - has the owner/operator obtained a written assessment of the drip pad, reviewed and certified by an independent registered professional engineer (IRPE)? Yes_____ No_____ N/A_____ - has this assessment been reviewed, updated and recertified annually until all upgrades, repairs or modifications are completed? Yes_____ No_____ N/A_____ - does the evaluation justify and document the age of the drip pad and the extent to which the drip pad meets each of the design and operating standards of Section 725.543(b)? Yes_____ No_____ N/A_____	725.541(a)
725.541(b)	Has the owner/operator developed a written plan for upgrading, repairing and modifying the drip pad to meet the requirements of Section 725.543(b)? Yes_____ No_____ N/A_____ - has this plan been submitted to the Agency no later than two (2) years before the date that all repairs, upgrades and modifications will be completed? Yes_____ No_____ N/A_____	
	Note: This plan must describe all changes made to the drip pad in sufficient detail to document compliance with all requirements of Section 725.543 and must document the age of the drip pad to the extent possible. This plan must be reviewed by an IRPE.	725.541(b)
	Have all upgrades, repairs and modifications been completed in accordance with the requirements of subsections (b)(1), (b)(2) and (b)(3)? Yes_____ No_____ N/A_____	
725.541(c)	Has the facility, upon completion of all repairs, upgrades and modifications, submitted the as-built drawings for the drip pad, together with certification by an IRPE to the Agency? Yes_____ No_____ N/A_____	725.541(c)
725.541(d)	If the drip pad is found to be leaking or unfit for use, has the owner/operator complied with the provisions of Section 725.543(m) or 725.545? Yes_____ No_____ N/A_____ Upon completion of all upgrades, repairs and modifications, has the owner/operator submitted to the Agency, the as-built drawings and certification by an IRPE attesting that the drip pad conforms to the drawings? Yes_____ No_____ N/A_____ If the drip pad is found to be leaking or unfit for use, has the owner/operator complied with the provisions of Section 725.543(m) or closed the drip pad in accordance with Section 725.545? Yes_____ No_____ N/A_____	725.541(d)
	Section 725.542 Design and Installation of New Drip Pads	
725.542	Has the owner or operator of a new drip pad ensured that the pad is designed, installed and operated in accordance with the requirements of Sections 725.543, 725.544 and 725.545? Yes_____ No_____ N/A_____	725.542

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.543(a)	**Section 725.543 Design and Operating Requirements** Has the drip pad(s) met the following requirements: 1) constructed of material other than earthen material, wood or asphalt (unless the asphalt is structurally supported)? Yes_____ No_____ N/A_____ 2) sloped to free-drain liquid to the associated collection system? Yes_____ No_____ N/A_____ 3) curbed or bermed around the perimeter? Yes_____ No_____ N/A_____ 4) made impermeable by June 24, 1993 (e.g., concrete pads must be sealed or covered with an impermeable material)? Yes_____ No_____ N/A_____ 5) be of sufficient structural strength and thickness to prevent failure due to physical contact, climate, stress of installation and daily operation? Yes_____ No_____ N/A_____	725.543(a)
725.543(b)	Does the new or existing drip pad have the following: 1) a synthetic liner below the drip pad that is constructed and installed to prevent leakage from the drip pad? Yes_____ No_____ N/A_____ A) constructed of materials that have appropriate chemical properties and sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with waste or drip pad leakage, climate, the stress of installation and the stress of daily operation? Yes_____ No_____ N/A_____ B) placed upon a foundation or base capable of providing support to the liner and resistance to pressure gradients above and below the liner to prevent failure of the liner due to settlement, compression or uplift? Yes_____ No_____ N/A_____ C) installed to cover all surrounding earth that could come in contact with the waste or leakage? Yes_____ No_____ N/A_____ 2) a leak detection system immediately above the liner that is designed, constructed, maintained and operated to detect leakage from the drip pad must be: A) constructed of materials that are: i) chemically resistant to the waste managed in the drip pad and the leakage that might be generated? Yes_____ No_____ N/A_____ ii) designed and operated to function without clogging through the scheduled closure of the drip pad? Yes_____ No_____ N/A_____ iii) of sufficient strength and thickness to prevent collapse under pressure exerted by overlaying materials and by any equipment used on the drip pad? Yes_____ No_____ N/A_____	725.543(b)
725.543(c)	Is the drip pad maintained such that it remains free of cracks, gaps, corrosion or other deterioration? Yes_____ No_____ N/A_____ **Note:** See Section 725.543(m) for remedial action required if deterioration or leakage is detected.	725.543(c)
725.543(d)	Is the drip pad and associated collection system designed and operated to convey, drain and collect liquid resulting from drippage or precipitation in order to prevent run-off? Yes_____ No_____ N/A_____	725.543(d)
725.543(e)	Unless protected by a structure, does the drip pad control run-on from a 24 hour, 25 year storm, unless the system has sufficient excess capacity to contain any run-on that might enter the system? Yes_____ No_____ N/A_____	725.543(e)
725.543(f)	Unless protected by a structure, does the drip pad have a run-off management system to collect and control at least the water volume resulting from a 24-hour, 25-year storm? Yes_____ No_____ N/A_____	725.543(f)
725.543(g)	Has the owner/operator obtained a statement from an IRPE certifying that the drip pad design meets the requirements of 725.543(a) through (g)? Yes_____ No_____ N/A_____	725.543(g)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.543(h)	Is drippage and accumulated precipitation removed from the associated collection system as necessary to prevent overflow onto the drip pad? Yes_____ No_____ N/A_____	725.543(h)
725.543(i)	Is the drip pad cleaned thoroughly at least once every seven days? Yes_____ No_____ N/A_____ - Is documentation being kept in an operating log of the date and time of each cleaning and the cleaning procedure used? Yes_____ No_____ N/A_____	725.543(i)
725.543(j)	Is the drip pad being operated and maintained in a manner to minimize tracking of hazardous waste or hazardous waste constituents off the drip pad as a result of activities by personnel or equipment? Yes_____ No_____ N/A_____	725.543(j)
725.543(k)	Is treated wood, after removal from the treatment vessel, held on the drip pad until drippage has ceased? Yes_____ No_____ N/A_____ - Is documentation being kept that all treated wood is held on the pad, in accordance with this Section, following treatment? Yes_____ No_____ N/A_____	725.543(k)
725.543(l)	Are collection and holding units associated with run-on and run-off control systems being emptied as soon as possible after storms? Yes_____ No_____ N/A_____	725.543(l)
725.543(m)	Has a release of hazardous waste occurred from the drip pad? Yes_____ No_____ N/A_____ 1) Upon detection of a release, has the owner/operator complied with the following: A) recorded the release in the facility's operating log? Yes_____ No_____ N/A_____ B) immediately removed from service the portion of the drip pad affected by the condition? Yes_____ No_____ N/A_____ C) determined what steps must be taken to repair the drip pad, clean up any leakage from below the drip pad, and establish a schedule for accomplishing the clean up and repairs? Yes_____ No_____ N/A_____ D) notified the Agency within 24 hours?; and Yes_____ No_____ N/A_____ provided written notice to the Agency including the information required in Section 725.543(m)(1)(D) above within 10 days? Yes_____ No_____ N/A_____ 3) Upon completion of all repairs and clean up, notified the Agency in writing and provided a certification signed by the IRPE? Yes_____ No_____ N/A_____	725.543(m)
725.543(n)	Is the owner/operator documenting, in the facility's operating log, past operating and waste handling practices? Yes_____ No_____ N/A_____ Do these records include the following: - identification of preservation formulations used in the past? Yes_____ No_____ N/A_____ - a description of drippage management practices? Yes_____ No_____ N/A_____ - a description of treated wood storage practices? Yes_____ No_____ N/A_____ - a description of treated wood handling practices? Yes_____ No_____ N/A_____	725.543(n)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	Section 725.544 Inspections	
725.544(a)	Have liners and cover systems (e.g., membranes, sheets or coatings) been inspected for uniformity, damage and imperfections (e.g., holes, cracks, thin spots or foreign materials) during construction or installation? Yes_____ No_____ N/A_____ - Have liners and cover systems been inspected and certified as meeting the requirements of 725.543 by an IRPE immediately after construction or installation? Yes_____ No_____ N/A_____ - Is this certification being maintained at the facility? Yes_____ No_____ N/A_____ - Have liners and covers been inspected to ensure tight seams and joints and the absence of tears, punctures or blisters after installation? Yes_____ No_____ N/A_____	725.544(a)
725.544(b)	While in operation, is the drip pad being inspected weekly and after storm events for: - deterioration, malfunctions or improper operation of run-on and run-off systems? Yes_____ No_____ N/A_____ - presence of leakage in and proper function of the leak detection system? Yes_____ No_____ N/A_____ - deterioration or cracking of the drip pad surface? Yes_____ No_____ N/A_____	725.544(b)
	Note: See Section 725.543(m) for remedial action required if deterioration or leakage is detected.	
	Section 725.545 Closure	
	Note: Determine compliance with this Section only in conjunction with a closure verification inspection.	
725.545	Has the drip pad unit been closed in accordance with an approved closure plan? Yes_____ No_____ N/A_____ Has the owner/operator of an existing drip pad unit without a liner prepared a contingent closure and post-closure plan? Yes_____ No_____ N/A_____	725.545
	SUBPART AA: AIR EMISSION STANDARDS FOR PROCESS VENTS	
	Section 725.930 Applicability	
725.930(b)	Has the owner/operator who has process vents identified in Section 725.930(b) above managed hazardous waste with organic concentrations of at least 10 ppmw (parts per million by weight) in: 1) units that are subject to the permitting requirements of Part 703; or 2) hazardous waste recycling units that are located in hazardous waste management facilities otherwise subject to the permitting requirements of Part 703? Yes_____ No_____ N/A_____	
	Note: The requirements of Section 725.932 through 725.936 apply to process vents on hazardous waste recycling units previously exempt under Section 721.106(c)(1). Other exemptions under Section 721.104, 722.134 and 725.101(c) are not affected by these requirements.	
	Section 725.932 Standards: Process Vents	
725.932(a)	Has the owner/operator who has process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managed those wastes by: 1) reducing total organic emissions at the facility below 1.4 Kg/h (3 lb/h) and 2.8 Mg/yr (3. tons/yr); or 2) reducing, by use of a control device, total organic emissions at the facility by 95 weight percent? Yes_____ No_____ N/A_____	725.932(a)
725.932(b)	If the owner/operator installs a closed-vent system and control device to comply with the provisions of subsection (a), have the requirements of Section 725.933 been met? Yes_____ No_____ N/A_____	725.932(b)
725.932(c)	If the owner/operator uses performance tests to determine vent emissions, emission reductions or total organic compound concentrations achieved by add-on control devices, have the requirements of Section 725.934(c) been met? Yes_____ No_____ N/A_____	725.932(c)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.932(d)	If an owner/operator and the Agency have disagreed on engineering calculations, have the procedures in Section 725.934(c) been used to resolve the disagreement? Yes_____ No_____ N/A_____	725.932(d)
	Section 725.933 Standards: Closed-Vent Systems and Control Devices	
725.933(a)	Has the owner/operator of closed-vent systems and control devices complied with the provisions of this Section? Yes_____ No_____ N/A_____	
	Has the owner/operator who was not able to comply with the provisions of this Subpart prepared an implementation schedule that may allow up to 30 months after the effective date that the facility becomes subject to this Subpart for installation and start-up and included dates by which the closed-vent system and control device will be installed and in operation? Yes_____ No_____ N/A_____	725.933(a)
725.933(b)	Has the owner/operator who uses a control device involving vapor recovery designed and operated to recover the organic vapors vented to it with the efficiency required in this subsection? Yes_____ No_____ N/A_____	725.933(b)
725.933(c)	Has the owner/operator who uses an enclosed combustion device (e.g. a vapor incinerator, boiler or process heater) designed and operated it with the requirements of this subsection? Yes_____ No_____ N/A_____	
	If an oiler or a process heater is used as the control device, has the vent stream been introduced into the flame zone of the boiler or process heater? Yes_____ No_____ N/A_____	725.933(c)
725.933(d)	Has the owner/operator designed and operated a flare so that: 1) there are not visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours?; and 2) a flame is present at all times; and 3) the heating value meets one of the values specified in this subsection and has been determined by the methods specified in subsection (e)(2)? Yes_____ No_____ N/A_____	
	4) Has the steam-assisted or non-assisted flare been designed for and operated with an exit velocity as determined by the methods specified in subsections (e)(3) and (e)(4), and with the values specified in this subsection? Yes_____ No_____ N/A_____	725.933(d)
	5) Has the air-assisted flare been designed and operated with an exit velocity less than the value determined by the method specified in subsection (e)(5)? Yes_____ No_____ N/A_____ 6) Is the flare used to comply with this Section steam-assisted, air-assisted or non-assisted? Yes_____ No_____ N/A_____	
725.933(e)	Did the owner/operator use the methods specified in this Subpart to determine the compliance of a flare with the visible emissions, heat value and velocities identified in this Subpart? Yes_____ No_____ N/A_____	725.933(e)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.933(f)	Has the owner/operator monitored and inspected each control device required to comply with this Section to ensure proper operation and maintenance of the control device by implementing the requirements specified in the following subsections: 1) for a flow indicator? Yes_____ No_____ N/A_____ 2) for a device to continuously monitor the control device operation: A) for a thermal vapor incinerator, a temperature monitoring device? Yes_____ No_____ N/A_____ B) for a catalytic vapor incinerator, a temperature monitoring device? Yes_____ No_____ N/A_____ C) for a flare, a heat sensing monitoring device? Yes_____ No_____ N/A_____ D) for a boiler or process heater with heat input capacity less than 44 MW, a temperature monitoring device? Yes_____ No_____ N/A_____ E) for a boiler or process heater with heat input capacity greater than or equal to 44 MW, a monitoring device equipped with a continuous recorder? Yes_____ No_____ N/A_____ F) for a condenser, either a monitoring device equipped with a continuous recorder or temperature monitoring device equipped with a continuous recorder? Yes_____ No_____ N/A_____ G) for a carbon adsorption system, a monitoring device equipped with a continuous recorder? Yes_____ No_____ N/A_____ 3) inspected the readings from each monitoring device required by subsections (f)(1) and (f)(2) at least once each operating day and, if necessary, implemented the corrective measures to ensure compliance with the requirements of this Section? Yes_____ No_____ N/A_____	725.933(f)
725.933(g)	If an owner/operator uses a carbon adsorption system as described in this subsection, has the predetermined time interval that is no longer than the carbon service life been established as the requirement of Section 725.935(b)(4)(C)(vi)? Yes_____ No_____ N/A_____	725.933(g)
725.933(h)	Has the owner/operator who uses a carbon adsorption system, as described in this subsection, used the procedures specified to replace the existing carbon with fresh carbon on a regular basis? Yes_____ No_____ N/A_____	725.933(h)
725.933(i)	Has the owner/operator who uses a control device other than those specified documented the control device operation and identified the process parameter(s) that indicate proper operation and maintenance of the control device? Yes_____ No_____ N/A_____	725.933(i)
725.933(j)	Has the owner/operator met the requirements of this subsection for closed-vent systems? Yes_____ No_____ N/A_____	725.933(j)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.933(k)	Has the owner/operator monitored and inspected each closed-vent system required to comply with this Section to ensure proper operation and maintenance of the closed-vent system by implementing the following requirements: 1) for a system used to comply with subsection (j)(1) of this Section: A) an initial leak detection prior to the date the system became subject to this Section using procedures specified in Section 725.934(b)? Yes_____ No_____ N/A_____ B) (i) after initial leak detection, inspect and monitor permanently or semi-permanently sealed joints or other seams or other connectors once per year for defects using procedures specified in Section 725.934(b)? Yes_____ No_____ N/A_____ (ii) for components or connection other than those specified in (k)(1)(B)(i) monitored annually or as required by Regional Administrator using procedures specified in Section 725.934(b)? Yes_____ No_____ N/A_____ C) repairs detected defects or leaks in accordance with subsection (k)(3) of this Section? Yes_____ No_____ N/A_____ D) maintain inspection and monitoring records in accordance with Section 725.935? Yes_____ No_____ N/A_____ 2) for a system used to comply with subsection (j)(2) of this Section: A) visually inspected for defects that could result in air pollutant emissions? Yes_____ No_____ N/A_____ B) performed on initial inspection of the system on or before the date the system became subject to this section with inspection at least once per year thereafter: Yes_____ No_____ N/A_____ C) repair detected defects or leaks in accordance with Subsection (k)(3) of this Section? Yes_____ No_____ N/A_____ D) maintain inspection and monitoring records in accordance with Section 725.935? Yes_____ No_____ N/A_____ 3) repaired all detected defects as follows: A) emissions detected by visual inspection or instrument reading greater than 500 ppmv above background where controlled as soon as practicable but not later than 15 calendar days after detection? Yes_____ No_____ N/A_____ B) a first attempt at repairs is made no later than five calendar days after detection? Yes_____ No_____ N/A_____ C) for repairs delayed as allowed in subsection (3)(C), were repairs completed by end of next process unit shutdown? Yes_____ No_____ N/A_____ D) maintained repair records in accordance with 725.935? Yes_____ No_____ N/A_____	725.933(k)
725.933(l)	Have the closed-vent systems and control devices been operated at all times when emissions may have been vented to them? Yes_____ No_____ N/A_____	725.933(l)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.933(m)	Has the owner/operator using a carbon absorption system to control air pollutant emissions documented that all hazardous waste carbon that is removed from the control device is managed in one of the following manners that meets the requirement of this subsection: 1) is regenerated or reactivated in a thermal treatment unit; 2) is incinerated in a hazardous waste incinerator; or 3) is burned in a boiler or industrial furnace? Yes_____ No_____ N/A_____	725.933(m)
725.933(n)	Has the owner/operator of a closed-vent system with components designated as unsafe to monitor met the exemption requirements of this subsection? Yes_____ No_____ N/A_____	725.933(n)
	Section 725.934 Test Methods and Procedures	
725.934	Has the owner/operator subject to the provisions of this Subpart complied with the test methods and procedure requirements provided in this Section? Yes_____ No_____ N/A_____	725.934
	Section 725.935 Recordkeeping Requirements	
725.935(a)	Has the owner/operator complied with the recordkeeping requirements of this Section? Yes_____ No_____ N/A_____	725.935(a)
725.935(b)	Has the following information been recorded in the facility's operating record: 1) for facilities that comply with Section 725. 933(a)(2), an implementation schedule for the closed-vent system and control device that meets the requirements of this subsection? Yes_____ No_____ N/A_____ 2) documentation of compliance for the process vent standards in Section 725.932 that includes the requirements of this subsection? Yes_____ No_____ N/A_____ 3) a performance test plan to determine the organic removal efficiency or total organic compound concentration? Yes_____ No_____ N/A_____ If "Yes", does the plan include the following: A) a description of how the planned test is going to be conducted? Yes_____ No_____ N/A_____ B) an engineering description of the closed-vent system and control device, including the manufacturer's name and model number, type, dimensions, capacity and construction materials? Yes_____ No_____ N/A_____ C) a description of sampling and monitoring procedures including the requirements of this subsection? Yes_____ No_____ N/A_____	725.935(b)
	Comments:	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	4) documentation of compliance with Section 725.933? Yes_____ No_____ N/A_____ If yes, does the documentation include the following: A) a list of information references and services? Yes_____ No_____ N/A_____ B) records of the dates of each compliance test required by Section 725.933(j)? Yes_____ No_____ N/A_____ C) engineering calculations, if used, accompanied by basic control device design information and design analysis that address the vent stream characteristics and control device operation parameters as specified in this subsection? Yes_____ No_____ N/A_____ D) a statement signed and dated by the owner/operator certifying the operating parameters used in design analysis represents conditions that would exist when the unit is at highest load or capacity level? Yes_____ No_____ N/A_____ E) a statement signed and dated by the owner/operator certifying the control device meets the efficiency requirements of this subsection? Yes_____ No_____ N/A_____ **NOTE:** A statement provided by the control device manufacturers or vendor certifying that the control equipment meets the design specifications may be used to comply with this requirement. F) all test results if performance tests are used to demonstrate compliance? Yes_____ No_____ N/A_____	
725.935(c)	Has the following information been recorded in the facility's operating records: 1) description and date of each modification that is made to the closed vent system or control device design? Yes_____ No_____ N/A_____ 2) identification of operating parameters, descriptions of monitoring devices, and diagrams of monitoring sensor locations used to comply with Section 725.933(f)(1) and (2)? Yes_____ No_____ N/A_____ 3) monitoring, operating, and inspection information required by Section 725.933(f) through (k)? Yes_____ No_____ N/A_____ 4) date, time, and duration of each period the control device is operating while monitored parameters exceed values specified in this subsection? Yes_____ No_____ N/A_____ 5) an explanation for each period recorded under subsection (c)(4) of this Section? Yes_____ No_____ N/A_____ 6) for carbon adsorption systems subject to Section 725.933(g) or (h)(2), any date when the existing carbon is replaced with fresh carbon? Yes_____ No_____ N/A_____ 7) for carbon adsorption systems subject to Section 725.933(h)(1), a log that records date and time when the control device is monitored for carbon breakthrough, the monitoring device reading, and date when existing carbon is replaced with fresh carbon? Yes_____ No_____ N/A_____ 8) date of each control device startup and shutdown? Yes_____ No_____ N/A_____ 9) identification of closed-vent system components designated as unsafe to monitor, an explanation why the component is unsafe to monitor, and the plan for monitoring each closed-vent system component? Yes_____ No_____ N/A_____ 10) for each leak detected as specified in Section 725.933(k), the information specified in subsection (10)(A) through (E) of this Section? Yes_____ No_____ N/A_____	725.935(c)
725.935(d)	Has the owner/operator maintained records of the monitoring, operating, and inspection information required by subsections (c)(3) through (10) of this Section for at least three years following the date of each occurrence, measurement, corrective action, or record? Yes_____ No_____ N/A_____	725.935(d)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.935(e)	Has the owner/operator recorded in the facility operating record monitoring and inspection information indicating proper operation and maintenance of a control device other than a thermal vapor incinerator, catalytic vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system? Yes_____ No_____ N/A_____	725.935(e)
725.935(f)	Has the owner/operator recorded in the facility operating record the data used to determine if a process vent is subject to Sections 725.932 and 725.934(d)(2) when application of the knowledge of the nature of the hazardous waste stream, or the process by which it was produced, is used? Yes_____ No_____ N/A_____	725.935(f)
	SUBPART BB: AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS	
	Section 725.950 Applicability **Note:** If any equipment is in contact with hazardous waste, with an organic concentration of at least 10% by weight for a period of 300 hours per calendar year, it is subject to this Subpart. Equipment in contact with regulated waste less than 300 hours per calendar year is excluded from the requirements of this subpart, if it is identified as required in Section 725.964(g)(6).	
725.950(c)	Is equipment in contact with hazardous wastes with concentrations of at least 10% by weight marked to be readily distinguished from other equipment? Yes_____ No_____ N/A_____	725.950(c)
725.950(d)	Is equipment in vacuum service identified in the operating record? Yes_____ No_____ N/A_____ **Note:** If "No", Sections 725.952 - 725.960 apply to these units.	725.950(d)
	Section 725.952 Standards: Pumps in Light Liquid Service	
725.952(a)	Is each pump monitored monthly to detect leaks? Yes_____ No_____ N/A_____ 1) Are methods specified in 725.963(b) utilized? Yes_____ No_____ N/A_____ 2) Are the pumps visually inspected weekly? Yes_____ No_____ N/A_____	725.952(a)
725.952(c)	If a leak has been detected, has it been repaired as soon as practicable, or no later than 15 days after detection? Yes_____ No_____ N/A_____ Was a first attempt at repair made no later than 5 days after detection? Yes_____ No_____ N/A_____ **Note:** Pumps equipped with dual mechanical seals including a barrier fluid system are exempt from the inspection provisions if they meet the requirements of 725.292(d). **Note:** Pumps designated for no detectable emissions are exempt from the requirements of a., b., & c. if they meet the requirements of 725.952(e).	725.952(c)
	Section 725.953 Standards: Compressors	
725.953(a)	Is each compressor equipped with an adequate seal system that includes a barrier fluid system (BFS)? Yes_____ No_____ N/A_____	725.953(a)
725.953(b)	Is each compressor seal system: 1) operated with the barrier fluid at a pressure greater than the compressor stuffing box; or 2) equipped with a BFS connected to a closed vent system control device; or 3) purges the barrier fluid into the HW with no emissions? Yes_____ No_____ N/A_____	725.953(b)
725.953(c)	Does the seal use a barrier fluid that is not a hazardous waste? Yes_____ No_____ N/A_____	725.953(c)
725.953(d)	Does the BFS have a sensor that will detect failures: Yes_____ No_____ N/A_____	725.953(d)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.953(e)	1) Has each sensor been checked daily or equipped with an audible alarm that is checked monthly (or at unmanned areas, checked daily)? Yes_____ No_____ N/A_____	
	2) Has the owner/operator determined criteria for what constitutes a failure of the seal system and/or the BFS? Yes_____ No_____ N/A_____	725.953(e)
725.953(g)	1) If a leak has been detected, has it been repaired not later than 15 days after detection? Yes_____ No_____ N/A_____	
	2) Was a first attempt at repair made within 5 days? Yes_____ No_____ N/A_____	725.953(g)
	Note: A compressor designated for no emissions is exempt from a-h if the requirements of 725.953(i) are met.	
	Section 725.954 Standards: Pressure Relief Devices in Gas/Vapor Service	
725.954(a)	Except during pressure releases, is each device operated with no detectable emissions? Yes_____ No_____ N/A_____	725.954(a)
725.954(b)	1) Following a pressure release, was the device returned to no detectable emission condition within 5 days? Yes_____ No_____ N/A_____	
	2) Was the device monitored to confirm this within 5 days by a method specified in 725.963? Yes_____ No_____ N/A_____	725.954(b)
	Note: Devices with a closed vent capture and return system are exempt from subsections (a) & (b).	
725.955(a)	Is each sampling connection system equipped with a closed purge or closed vent system? Yes_____ No_____ N/A_____	725.955(a)
725.955(b)	Each closed purge or closed vent system must: 1) return the purged waste directly to the process line with no detectable emissions; or 2) collect and recycle the purged waste with no detectable emissions; or 3) be designed and operated to capture and transport all purged wastes to a control device which meets 725.960? Yes_____ No_____ N/A_____	725.955(b)
	Note: In Situ sampling systems are exempt from 725.955 (a) & (b).	
	Section 725.956 Standards: Open-Ended Valves or Lines	
725.956(a)	1) Is each open-ended valve or line equipped with a cap, blind flange, plug or second valve? Yes_____ No_____ N/A_____	
	2) Does the cap, blind flange, plug or second valve seal the open ended line or valve except during operations? Yes_____ No_____ N/A_____	725.956(a)
725.956(b)	Where a second valve is used, is the valve on the waste stream end closed first? Yes_____ No_____ N/A_____	725.956(b)
	Section 725.957 Standards: Valves in Gas/Vapor or Light Liquid Service	
725.957(a)	Are valves in this service monitored monthly? Yes_____ No_____ N/A_____	
	Is a method specified in 725.963 used for this monitoring? Yes_____ No_____ N/A_____	725.957(a)
725.957(c)	Are valves monitored the first month of every quarter if they have not leaked for 2 months, or monthly until a leak is not detected for 2 months? Yes_____ No_____ N/A_____	725.957(c)
725.957(d)	1) If a leak was detected, was the valve repaired in not more than 15 days? Yes_____ No_____ N/A_____	
	2) Was a first attempt at repair made in not more than 5 days? Yes_____ No_____ N/A_____	
	Note: Valves designated as no detectable emissions, unsafe to monitor or difficult to monitor are exempt from subsection (a) if they meet the requirements of 725.957(f), (g) or (h).	725.957(d)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.958(a)	**Section 725.958 Standards: Pumps, Valves, Pressure Relief Devices, Flanges and Other Connectors** Are pumps and valves in heavy liquid service, pressure relief devices, flanges and connectors monitored within 5 days if a leak is suspected using visual, audible, olfactory or other detection method? Yes_____ No_____ N/A_____	725.958(a)
725.958(c)	1) If a leak was detected, were repairs made within 15 days? Yes_____ No_____ N/A_____ 2) Was a first attempt at repair made in not more than 5 days? Yes_____ No_____ N/A_____ **Note:** Any connector that is inaccessible or is ceramic-lined is exempt from the monitoring requirements of this Part and the recordkeeping requirements of Section 725.964.	725.958(c)
725.959	**Section 725.959 Standards: Delay of Repair** Do any delays in repair to leaking equipment meet the exclusions outlined in this section? Yes_____ No_____ N/A_____	725.959
725.960	**Section 725.960 Standards: Closed-Vent Systems and Control Devices** Has the owner/operator of a closed vent system or control device complied with the provisions of 725.933? Yes_____ No_____ N/A_____	725.960
725.961	**Section 725.961 Percent Leakage Alternative for Valves** For all valves within a HWMU, if the 2% leakage alternative is chosen, is the owner/operator complying with the requirements of this Section? Yes_____ No_____ N/A_____	725.961
725.962	**Section 725.962 Skip Period Alternative for Valves** For all valves in a HWMU, if reduced monitoring options are chosen, is the owner/operator meeting the requirements of this Section? Yes_____ No_____ N/A_____	725.962
725.963	**Section 725.963 Test Methods and Procedures** Are the appropriate test methods and procedures followed for: b) leak detection monitoring? Yes_____ No_____ N/A_____ c) no detectable emissions demonstrations? Yes_____ No_____ N/A_____ d) hazardous waste organic concentrations? Yes_____ No_____ N/A_____ e) revisions to the determinations that equipment contains hazardous waste? Yes_____ No_____ N/A_____	725.963
725.964(b)	**Section 725.964 Recordkeeping Requirements** Is the following information being maintained in the operating record: 1) for each piece of applicable equipment: A) the equipment ID number and the HWMU identification; B) approximate locations within the facility; C) the type of equipment (e.g. a pump or valve); D) percent by weight total organics in the hazardous wastestream at the equipment; E) state of the hazardous waste at the equipment; F) method of compliance with the standard? Yes_____ No_____ N/A_____ 2) for facilities that comply with 725.933(a)(2), the specified implementation schedule? Yes_____ No_____ N/A_____ 3) the performance test plan specified in 725.935(b)(3) where test data is used for control devices? Yes_____ No_____ N/A_____	725.964(b)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.964(c)	When a leak is detected, have the following requirements been met: 1) a weatherproof and readily visible identification attached to the leaking equipment showing; - the equipment ID number; and - the date evidence of a potential leak was found; and - the date the leak was detected? Yes_____ No_____ N/A_____	
	2) Was the identification removed only after the equipment was repaired? Yes_____ No_____ N/A_____	725.964(c)
	3) In the case of the valve, has the identification been removed after monitoring shows no leak detected for 2 months? Yes_____ No_____ N/A_____	
725.964(d)	When a leak was detected, was the following information recorded in an inspection log and kept in the facility operating record: 1) the instrument and operator ID number and the equipment ID number; and 2) the date evidence of a potential leak was found; and 3) the date a leak was detected, and the dates of all repair attempts; and 4) repair methods applied; and 5) "above 10,000" if the instrument readings after each repair attempt where the readings were at or above 10,000 ppm; and 6) "Repair Delayed" and the reason, if repairs could not be made within 15 days; and 7) documentation supporting valve repair delays; and 8) the signature authorizing the determination that repairs could not be made without unit shutdown; and 9) the expected date of repair; and 10) the actual date of successful repair? Yes_____ No_____ N/A_____	725.964(d)
725.964(e)	Is documentation on closed vent systems and control devices being maintained in the operating record? Yes_____ No_____ N/A_____	725.964(e)
725.964(f)	Is monitoring and inspection information on control devices maintained in the operating record? Yes_____ No_____ N/A_____	725.964(f)
725.964(g)	Is a log maintained for equipment subject to 725.952 through 725.960 showing: 1) a list of the ID numbers of equipment subject to these standards; and 2) a list of ID numbers for equipment designated as no detectable emissions, with a description signed by the operator; and 3) a list of equipment ID numbers for pressure relief devices; and 4) compliance test; and 5) a list of ID numbers of equipment in vacuum service; and 6) identification, either by list or location of equipment that contains or contacts hazardous waste with an organic concentration of at least 10% by weight for a period of less than 300 hours per year? Yes_____ No_____ N/A_____	725.964(g)
725.964(h)	Is a log kept in the facility operating record for all valves subject to 725.957(g) showing; 1) a list of ID numbers of all valves determined as unsafe to monitor, an explanation why and a monitoring plan; and 2) a list of ID numbers of equipment designated as difficult to monitor, an explanation and a monitoring plan; and monitoring schedule? Yes_____ No_____ N/A_____	725.964(h)
725.964(i)	Does the record for valves subject to 725.962 include: 1) a schedule of montoring; and 2) the percent of valves found leaking during each monitoring period? Yes_____ No_____ N/A_____	725.964(i)
725.964(j)	1) Is a log kept showing the criteria required in 725.952(d)(5)(B) and 725.953(e)(2) with an explanation of the design critiera? Yes_____ No_____ N/A_____	
	2) Does the log show changes in the criteria and an explanation for the changes? Yes_____ No_____ N/A_____	725.964(j)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.964(k)	Is a log kept on determining exemptions as specified in this Subpart? Yes_____ No_____ N/A_____	725.964(k)
725.964(l)	Is the operating and leak information being maintained for 3 years? Yes_____ No_____ N/A_____	725.964(l)
725.964(m)	Is the documentation for alternative compliance kept in accordance with this Subpart? Yes_____ No_____ N/A_____ COMMENTS:	725.964(m)
	SUBPART CC: AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS	
	Section 725.980 Applicability	
725.980	**Note:** This Subpart only applies to owners and operators that treat, store or dispose hazardous waste in tanks, surface impoundments, or containers subject to Subpart I, J, or K of Part 725, except as Section 725.101 and subsection 725.980(b) provide otherwise, that have an average volatile organic concentration of 500 ppmw or greater.	
	Note: Do any of the following general exclusions, referenced in Section 725.980(a), apply for the above regulated tanks, surface impoundments, and/or containers? 1. Wastewater treatment unit (725.101(c)(10)) 2. Emergency spill management unit (725.101(c)(11)) 1. Hazardous waste recycling unit (725.101(c)(6)) 2. Elementary neutralization unit (725.101(c)(10)) 3. Totally enclosed treatment unit (725.101(c)(9)) 4. Satellite accumulation area (725.101(c)(7) & 722.134(c)(1))	
	Note: Do any of the following specific exclusions listed in Section 725.980(b) apply for the above regulated tanks, surface impoundments, and/or containers? 1. Waste was placed in the unit prior to Oct. 6, 1996 and none has been added since. (725.980(b)(1)) 2. The **container** has a design capacity less than or equal to 0.1m^3 (3.5ft^3 or 26.4 gal). (725.980(b)(2)) 3. The **tank or surface impoundment** has stopped receiving waste and is undergoing closure pursuant to an approved closure plan. (725.980(b)(3) & 725.980(b)(4)) 4. The unit is used solely for on-site treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program. (725.980(b)(5)) 5. The unit is used solely to manage radioactive mixed waste. (725.980(b)(6)) 6. The unit operates with an emission control device regulated by and in accordance with Clean Air Act regulations. (725.980(b)(7)) 7. The unit operates with a process vent as defined in 725.931, regulated under Subpart AA. (725.980(b)(8))	
	Note: If a **tank or container** is used for the management of hazardous waste generated by organic peroxide manufacturing and its associated lab operations, see Section 725.980(d).	
	Section 725.982 Schedule for Implementation of Air Emission Standards	
725.982(a)(1)	Has the owner or operator of a facility in existence on December 6, 1996, and subject to Subpart I, J, or K of this Part, installed and begun operating all control equipment for waste management units to comply with Subpart CC, or completed modifications of production or treatment processes to satisfy exemption criteria of Section 725.983(c) by December 8, 1997? Yes_____ No_____ N/A_X_	725.982(a)(1)
725.982(b)(1)	Has the owner or operator of a facility or unit in existence **on the effective date of the statutory or regulatory amendments** that render the facility subject to Subpart I, J, or K installed and begun operating all control equipment for waste management units to comply with Subpart CC, or completed modifications of production or	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	treatment processes to satisfy exemption criteria of Section 725.983(c) by either the effective date of the amendment, or no later than 30 months after the effective date of the amendment and maintained an implementation schedule pursuant to Section 725.982(b)(2)(B)? Yes____ No____ N/A X	725.982(b)(1)
725.982(c)	Has the owner or operator of a facility or unit that becomes newly subject to the requirements of Subpart CC after December 8, 1997 due to an action other than those described in subsection 725.982(b) immediately complied with all applicable requirements (i.e. control devices)? Yes____ No____ N/A X	725.982(c)
	Section 725.983 Standards: General	
725.983(b)	Has the owner or operator controlled air pollutant emissions from each hazardous waste management unit in accordance with the standards in Sections 725.985 through 725.988, except as provided for in subsection 725.983(c) (less than 500 ppmw VO concentration)? Yes X No____ N/A____	725.983(b)
	Section 725.984 Waste Determination Procedures	
725.984(a)(1)	Has the owner or operator determined the average VO concentration at the point of waste origination for each hazardous waste placed in a waste management unit exempted under Section 725.983(c)(1) (VO concentration less than 500 ppmw)? Yes X No____ N/A____	725.984(a)(1)
725.984(a)(2)	Has the owner or operator determined the average VO concentration of a hazardous waste at the point of waste origination, as required by subsection 725.984(a)(1), using either: A) direct measurement (725.984(a)(3)) or Yes X No____ N/A____ B) knowledge of the waste (725.984(a)(4))? Yes____ No____ N/A____ **Note:** Documentation is required for either method of determination.	725.984(a)(2)
725.984(b)(1)	Has the owner or operator performed the applicable waste determination for each treated hazardous waste placed in a waste management unit exempted under Sections 725.983(c)(2)(A) through 725.983(c)(2)(F) from using air emission controls? Yes____ No____ N/A X	725.984(b)(1)
725.984(b)(2)	Has the owner or operator designated and recorded the specific provision in Section 725.983(c)(2) under which the waste determination for each treated hazardous waste is being performed? Yes____ No____ N/A X	725.984(b)(2)
	Has the waste determination for the treated hazardous waste been performed using the applicable procedures specified in subsections 725.984(b)(3) through 725.984(b)(9)? Yes____ No____ N/A X	
725.984(c)(1)	Has the owner or operator determined the maximum organic vapor pressure for each hazardous waste placed in a **tank** using Tank Level 1 controls in accordance with Section 725.985(c)? Yes____ No____ N/A X	725.984(c)(1)
725.984(c)(2)	Has the owner or operator used either: A) direct measurement (725.984(c)(3)) or Yes____ No____ N/A X B) knowledge of the waste (725.984(c)(4)) Yes____ No____ N/A X to determine the maximum organic vapor pressure that is representative of the hazardous waste composition stored or treated in the **tank**? **Note:** Documentation is required for either method of determination.	725.984(c)(2)
725.984(d)	Has the owner or operator followed the procedure for determining no detectable organic emissions, specified in subsections 725.984(d)(1) through 725.984(d)(9), for the purpose of complying with Subpart CC? Yes____ No____ N/A X	725.984(d)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.985(b)	**Section 725.985 Standards: Tanks** Has the owner or operator controlled air pollutant emissions from each tank subject to this Section: Yes _____ No _____ N/A **Note:** If no, identify the tank number and specific violation on the Tank Disposition Form.	725.985(b)
	Note: The owner or operator may control such air pollutant emissions by applying Tank Level 1 controls or Tank Level 2 controls. Tank Level 1 or Tank Level 2 controls may only be applied to tanks that meet certain conditions related to design capacity and Maximum Organic Vapor Pressure (MOVP). The owner or operator may use direct measurement or knowledge of the waste to determine the MOVP as explained in Section 725.984(c). The MOVP, by design capacity, are as follows: **Volume** — **MOVP** >39,887 ga — 0.75 psia >19,810 but <39,887 gal — 4.0 psia >19,810 gal — 11.1 psia **Note:** In order to use Tank Level 1 controls, a tank must be equipped with a fixed roof design. See subsection 725.985(c)(2) below for additional requirements. In addition, the hazardous waste in the tank cannot be heated to a temperature above that at which the MOVP of the waste was determined and the hazardous waste cannot be treated in the tank using any waste stabilization process as defined in Section 725.981. Tanks used to manage hazardous waste that do not meet **ALL** of the conditions described in subsection 725.985(b)(1) must use Tank Level 2 controls to control air pollutant emissions.	
725.985(c)(1)	Has the owner or operator determined the MOVP using the procedures specified in Section 725.984(c) for each hazardous waste prior to placing it in a tank using Tank Level 1 controls? Yes _____ No _____ N/A _____	
	Has a new determination been made whenever changes to the hazardous waste managed in the tank could potentially cause the MOVP to increase to a level equal to or greater than the MOVP limit for the tank design capacity applicable to it? Yes _____ No _____ N/A _____	725.985(c)(1)
725.985(c)(2)	Has a fixed roof tank with Tank Level 1 controls been designed and equipped: A) with a roof and its closure devices that form a continuous barrier over the entire surface area of the hazardous waste in the tank? (This roof may be a separate cover or may be an integral part of the tank structural design (e.g., a hatch on a horizontal cylindrical tank).) Yes _____ No _____ N/A _____ B) in a manner so there are no visible cracks, holes, gaps or other open spaces between roof sections or roof edge and the tank wall? Yes _____ No _____ N/A _____ C) with each opening in the fixed roof and any manifold system associated with the fixed roof: i) equipped with a closure device that when closed does not have visible cracks, holes, gaps or other open spaces between the perimeter of the opening and the closure device; or ii) connected by a closed-vent system to a control device that removes or destroys organics in the vent stream and is operating whenever hazardous waste is managed in the tank? Yes _____ No _____ N/A _____ N/I: _____ **Note:** There is an exception to (c)(ii) (725.985(c)(2)(E)) that allows for the control device not to remove or destroy organics in the vent stream when the fixed roof is opened or removed or closure devices are opened for routine inspection, maintenance or other activities required for normal operations of the tank. Once these activities are completed, the roof or closure device must be secured and the control device must be returned to service. D) with the fixed roof and its closure devices made of materials that will minimize exposure of the hazardous waste in the tank to the atmosphere and maintain the integrity of the roof and closure devices throughout their intended service life? Yes _____ No _____ N/A _____	725.985(c)(2)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.985(c)(3)	Whenever hazardous waste is in the tank, is the fixed roof installed with each closure device secured in the closed position? Yes _____ No _____ N/A _____	
	Note: Exceptions to this requirement are allowed to provide access to the tank for performing routine inspections and maintenance, or other activities needed for normal operations including the removal of sludge or other residues from the bottom of the tank. In addition, the opening of pressure relief devices that vent to atmosphere is allowed during normal operations for the purpose of maintaining tank internal pressure within the tank's design specifications. Finally, the opening of safety devices which function exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere during unsafe conditions resulting from an unplanned accidental or emergency event is allowed.	725.985(c)(3)
725.985(c)(4)	Is the owner or operator inspecting the air emission control equipment in accordance with the following requirements? A) Is the fixed roof and its control devices visually inspected to check for defects? Yes _____ No _____ B) Has the owner or operator performed an initial inspection of the fixed roof and its closure devices on or before the date that the tank became subject to this Part and at least once every year following that date? Yes _____ No _____ N/A _____	
	Note: Longer than one year intervals are allowed under special conditions. See Section 725.985(l).	725.985(c)(4)
	C) Have any defects detected during these inspections been repaired starting no later than five calendar days after detection, with the repair completed as soon as possible but no later than 45 calendar days from detection? Yes _____ No _____ N/A _____	
	Note: A repair time of longer than 45 calendar days is allowed if the owner or operator determines that repair requires emptying or the temporary removal from service of the tank and no alternative tank capacity is available. In this case the owner or operator shall repair the tank the next time it ceases operation. It may not be returned to service until repairs are completed.	
	D) Are records of the inspections maintained that include: i) a tank identification number (or other unique identification description selected by the owner or operator)?; ii) the date of the inspection? and iii) for each defect observed, its location, description and date of corrective action? (If the date of corrective action is delayed past 45 calendar days, the reason for the delay must be included.) Yes _____ No _____	
725.985(d)	Is the owner or operator controlling air pollutant emissions from a tank with Tank Level 2 controls using one of the following tanks: A) A fixed-roof tank equipped with an internal floating roof in accordance with the requirements specified in Section 725.985(e); Yes _____ No _____ N/A _____	
	B) A tank equipped with an external floating roof in accordance with the requirements of Section 725.985(f); Yes _____ No _____ N/A _____	725.985(d)
	C) A tank vented through a closed-vent system to a control device in accordance with the requirements in Section 725.985(g); Yes _____ No _____ N/A _____	
	D) A pressure tank designed and operated in accordance with the requirements in Section 725.985(h); or Yes _____ No _____ N/A _____	

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	E) A tank located inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device in accordance with the requirements in Section 725.985(i). Yes _____ No _____ N/A ____/____ **Note:** Each of these Tank Level 2 controls is described in a subsequent Section of 725.985, as indicated above. Each of these subsections contains requirements regarding the equipment's design, construction, operation inspection and record keeping. As it is unlikely that many, if any, of these types of controls will be encountered during most normal inspections, no specific requirements have been included in this checklist. The inspector is referred to the regulations themselves. A space has been provided for recording the compliance status of any such control systems if they are encountered. A violation of any of the requirements in Sections 725.985(e) through (i) is also a violation of Section 725.983(b), 725.985(d), and 725.985(b).	
725.985(j)	Is the owner or operator who is transferring waste to a tank, doing so using: 1) Continuous hard piping, or Yes _____ No _____ N/A ____/____ Another closed system that does not allow exposure of the hazardous waste to the atmosphere. (An individual drain system, which meets the requirements of 40 CFR 63 Subpart RR is considered to be a closed system.) Yes _____ No _____ N/A ____/____	725.985(j)
	Note: The requirements of this subsection do not apply when transferring a hazardous waste to a tank under any of the following conditions: A) The hazardous waste meets the average VO concentrations of less than 500 ppmw as determined by procedures specified in 725.984(a) at the point of waste origin, or B) The hazardous waste has been treated by an organic destruction or removal process that meets the requirements of 725.983(c)(2), or C) The hazardous waste meets the: (1) Numerical concentration limits for organic hazardous constituents, applicable to the hazardous waste, found in 728.Table T, or 2) The organic hazardous constituents in the waste have been treated by a technology for the waste as set forth in 728.142(a), or 3) An equivalent method of treatment approved by the Agency pursuant to 728.142(b)).	
725.985(k)	1) Has the owner or operator repaired each defect detected during inspections performed in accordance with the requirements of 725.985(e)(3), (f)(3), or (g)(3) as follows: First efforts at repair are made no later than five calendar days after detection and completed as soon as possible but no later than 45 calendar days after detection? Yes _____ No _____ N/A ____/____ **Note:** See also 725.985(c)(4) above for Tank Level 1 controls for fixed roof tanks. 2) A repair time of longer than 45 calendar days is allowed if the owner or operator determines that the repair requires emptying or the temporary removal from service of the tank and no alternative tank capacity is available. In this case, has the owner or operator repaired the defect the next time it ceased operation? (It may not be returned to service until repairs are completed.) Yes _____ No _____ N/A ____/____ **Note:** Subsequent inspection and monitoring may be performed at intervals longer than one year under special conditions identified in subsection 725.985.(l). **Comments:**	725.985(k)